

1720 Walton Road Blue Bell, PA 19422 610-828-3078 Fax 610-828-7842

March 16, 2017

CERTIFIED MAIL; RETURN RECEIPT REQUESTED

Certified No. 7016 0910 0001 3150 9616

Mr. William F. Durham
Director, West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Subject: Title V Permit Renewal
Jupiter Aluminum Corporation – Coil Coating
Beech Bottom, West Virginia
Title V Operating Permit No: R30-00900004-2012 (1 of 2)
IES Project No. EV161123.02

Dear Mr. Durham:

On behalf of Jupiter Aluminum Corporation (Jupiter), IES Engineers (IES) is pleased to submit the enclosed Title V Operating Permit (TVOP) renewal application for its facility in Beech Bottom, West Virginia. One hard copy of the application package is attached. Two copies of this application package are being submitted on separate CDs.

The current Title V Permit No. R30-00900004-2012 (1 of 2) for Coating Line # 1 expires on October 10, 2017. The regulations of the Department require that the complete renewal application for the Title V permit be submitted at least six months, but not more than 18 months, before expiration of the permit. This renewal application is being submitted in advance of the due date for submission of the renewal application (by April 10, 2017).

This application package includes the following:

1. Renewal Title V Permit Application – General Forms
2. Title V Completeness Checklist
3. Area Map
4. Process Flow Diagrams for Coil Coating Line #1
5. Title V Equipment Table
6. Emission Unit Forms
7. Schedule Compliance Form
8. Air Pollution Control Device Forms
9. Compliance Assurance Monitoring (CAM) Plan Form



Mr. William F. Durham
March 16, 2017
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We look forward to working with you during your review of this permit renewal application. Please feel free to contact me or Mr. Mark Volkmann of Jupiter at (219) 933-2752 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Marjorie J. Fitzpatrick'.

Marjorie J. Fitzpatrick, QEP
Principal Project Manager

Attachment

cc: M. Volkmann, Jupiter
A. Soni, IES



1720 Walton Road Blue Bell, PA 19422 610-828-3078 Fax 610-828-7842

**TITLE V OPERATING PERMIT RENEWAL APPLICATION
TVOP R30-00900004-2012 (1 of 2)**

PREPARED FOR:

**JUPITER ALUMINUM CORPORATION
JUPITER COIL COATING
BEECH BOTTOM, WEST VIRGINIA**

SUBMITTED TO:

**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57TH STREET S.E.
CHARLESTON, WEST VIRGINIA 25304**

IES PROJECT NO. EV161123.02

MARCH 2017



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Attachment D — Emission Unit Forms

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Attachment G — Compliance Assurance Monitoring (CAM) Plan Form



FACILITY INFORMATION

Jupiter Aluminum Corporation (Jupiter) operates a coil coating operation in Beech Bottom, West Virginia. The facility operates under Title V Operating Permit No. R30-00900004-2012 (1 of 2), which expires on October 10, 2017.

Jupiter had purchased Coating Line # 1 from Business Development Corporation of the Northern Panhandle (BDC) in 2013. The Department approved the transfer of NSR Permit No. R13-2379C and Operating Permit R30-00900004-2012 via letter dated June 14, 2013. These permits regulate Coating Line # 1 and Coating Line # 2. Since Jupiter only owns Coating Line # 1, Jupiter applied to split the operating permit into two permits and the NSR permit into two permits in August 2015. The Department approved this request and the two permits were split as indicated below:

1. NSR Permit No. R13-2379D (Coating Line # 1)
2. NSR Permit No. R13-3265 (Coating Line # 2)
3. Title V Permit No. R30-00900004-2012 (1 of 2) (Coating Line # 1)
4. Title V Permit No. R30-00900004-2012 (2 of 2) (Coating Line # 2)

On July 21, 2016, Jupiter submitted a request to transfer Title V Permit No. R30-00900004-2012 (2 of 2) for Coating Line #2 to BDC. The Department approved this transfer request via letter dated September 23, 2016.

In 2013, four 25.2-MMBtu/hr boilers (previously included under Operating Permit No. R30-00900004-2012 (1 of 2)) were removed and replaced with one 8.65-MMBtu/hr natural gas-fired boiler. On August 25, 2016, Jupiter submitted an NSR Permit and Title V Permit Modification application to include the 8.65-MMBtu/hr boiler in NSR Permit No. R13-2379D and Title V Permit No. R30-00900004-2012 (1 of 2) and to remove the four 25.2-MMBtu/hr boilers from Title V Permit No. R30-00900004-2012 (1 of 2). The Department's approval is pending on the NSR Permit and Title V Modification application.

As a clarification, this TVOP renewal application pertains only to Title V Permit No. R30-00900004-2012 (1 of 2) (Coating Line # 1).



PROCESS DESCRIPTION

The Jupiter metal coil coating facility receives long thin strips of metal rolled into coils. The process includes the cleaning of the strip, applying a primer coat, drying, quenching and applying a finish coat, drying, and quenching and recoiling. The process results in the release of organic solvents as the coating materials are dried. This portion of the organic fume is controlled using a thermal oxidizer.

Jupiter operates its coil coating operations under NAICS code 332812- Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers (SIC Code 3479- Metal Coating and Allied Services).

There are no alternate operating scenarios for this facility.



RENEWAL TITLE V PERMIT APPLICATION



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Form with 10 numbered sections: 1. Name of Applicant (JUPITER ALUMINUM CORPORATION), 2. Facility Name or Location (JUPITER COIL COATING), 3. DAQ Plant ID No. (009-00004), 4. Federal Employer ID No. (FEIN) (363805478), 5. Permit Application Type (Renewal), 6. Type of Business Entity (Corporation), 7. Is the Applicant the: (Both), 8. Number of onsite employees (10), 9. Governmental Code (Privately owned and operated; 0), 10. Business Confidentiality Claims (No).

11. Mailing Address		
Street or P.O. Box: 8963 RIVER ROAD		
City: WELLSBURG	State: WV	Zip: 26030
Telephone Number: (304) 394-1559		Fax Number: (304) 394-1561

12. Facility Location (Physical Location)		
Street: 2481 RIVER ROAD	City: BEECH BOTTOM	County: BROOKE
UTM Easting: 529.208 km	UTM Northing: 4,451.69 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: Facility is located on the west side of West Virginia State Route 2, immediately south of the Village of Beech Bottom.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, for what air pollutants? PM2.5	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). OHIO PENNSYLVANIA	
Is facility located within 100 km of a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: Mark Volkmann		Title: Environmental, Health & Safety Director
Street or P.O. Box: 1745-165 th Street		
City: Hammond	State: IN	Zip: 46320
Telephone Number: (219) 933-2752	Fax Number: (219) 933-2724	
E-mail address:		
Environmental Contact: Mark Volkmann		Title: Environmental, Health & Safety Director
Street or P.O. Box: 1745-165 th Street		
City: Hammond	State: IN	Zip: 46320
Telephone Number: (219) 933-2752	Fax Number: (219) 933-2724	
E-mail address: MVolkmann@jupiteraluminum.com		
Application Preparer: Marjorie J. Fitzpatrick		Title: Principal Project Manager
Company: IES Engineers		
Street or P.O. Box: 1720 Walton Road		
City: Blue Bell	State: PA	Zip: 19422
Telephone Number: (610) 828-3078	Fax Number: (610) 828-7842	
E-mail address: mfitzpatrick@iesengineers.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Metal Coating	Coated Metal Coils	332812	3479

Provide a general description of operations.
 Coil coating is performed on Coating Line #1. Coating Line #1 includes a surface cleaning section, drying oven, primer coater, primer curing oven, primer quench tank, finish coater, finish curing oven, and finish quench tank. The coating line is controlled by a regenerative thermal oxidizer that complies with the appropriate MACT Standard. The facility is also subject to and complies with 40 CFR Part 60, Subpart TT for coil coating.
 The facility also operates one (1) natural gas-fired boiler to provide process steam.

- 15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.
- 16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."
- 17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input checked="" type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	
19. Non Applicability Determinations	
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <p>45CSR17 – This rule does not apply, as stated in 45CSR§17-6.1. Sources that are subject to the fugitive particulate matter emission requirements of 45CSR7 are exempt from 45CSR17</p> <p>45CSR21 – This rule is not applicable because the Jupiter Aluminum Corporation- Beech Bottom facility is not located in any of the affected counties</p> <p>45CSR27 – This rule does not apply because the Jupiter Aluminum Corporation- Beech Bottom facility is not considered a technical processing unit and does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.</p> <p>45CSR29 – This rule is not applicable because the Jupiter Aluminum Corporation- Beech Bottom facility is not located in any of the affected areas specified in the regulation.</p> <p>40 C.F.R. Part 63, Subpart DDDDD Boiler MACT – The Jupiter Aluminum Corporation- Beech Bottom facility is not a major source of HAPs. Therefore, this subpart does not apply.</p> <p>40 C.F.R. Part 63, Subpart JJJJJ (6J) – This regulation does not apply since the boilers are natural gas fired.</p> <p>40CFR Part 68 Risk Management Plan – This regulation is not applicable to the sources of at Jupiter Aluminum Corporation- Beech Bottom because none of the storage thresholds are triggered.</p> <p>40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) - This facility does not have pollutant specific emissions units that have potential pre-control device emissions greater than major source thresholds, and therefore is not subject to Compliance Assurance Monitoring.</p>	
<input checked="" type="checkbox"/> Permit Shield	

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 45 CSR§6-3.1(3.1e and 3.1.d State Enforceable Only) Open Burning – Title V Permit Condition 3.1.1
- 45 CSR§6-3.2 Open Burning Exemptions – Title V Permit Condition 3.1.2
- 40 CFR Part 61.145(b) and 45CSR15 - Asbestos – Title V Permit Condition 3.1.3
- 45 CSR§4-3.1 (State Enforceable Only) Odor – Title V Permit Condition 3.1.4
- 45 CSR§11-5.2 Standby Plan for Reducing Emissions – Title V Permit Condition 3.1.5
- WV Code § 22-5-4(a)(14) Emission Inventory – Title V Permit Condition 3.1.6
- 40 CFR Part 82, Subpart F Ozone Depleting Substances – Title V Permit Condition 3.1.7
- 40 CFR Part 68 – Risk Management Plan – Title V Permit Condition 3.1.8
- Permit No. R13-2379B Condition C.3 - Operate in Accordance with Permit – Title V Permit Condition 3.1.9
- WV Code § 22-5-4(a)(14-15) and 45 CSR 13 – Stack Testing – Title V Permit Condition 3.3.1
- 45 CSR § 30-5.1.c.2.A – Monitoring Information – Title V Permit Condition 3.4.1
- 45 CSR § 30-5.1.c.2.B – Retention of records – Title V Permit Condition 3.4.2
- 45 CSR § 30-5.1.c. (State Enforceable Only) Odor – Title V Permit Condition 3.4.3
- 45 CSR § 30-4.4 and 5.1.c.3.D. Responsible Official - Title V Permit Condition 3.5.1
- 45 CSR § 30-5.1.c.3.E. Confidentiality - Title V Permit Condition 3.5.2
- 45 CSR § 30-8. Certified Emissions Statement - Title V Permit Condition 3.5.4
- 45 CSR § 30-5.3.e Compliance Certification - Title V Permit Condition 3.5.5
- 45 CSR § 30-5.1.c.3.A. Semi-Annual Monitoring Reports – Title V Permit Condition 3.5.6
- 45 CSR § 30-5.7.a through e. - Emergencies - Title V Permit Condition 3.5.7
- 45 CSR § 30-5.1.c.3.B and C. - Deviations - Title V Permit Condition 3.5.8
- 45 CSR § 30-4.3.h.1.B - New Applicable Requirements - Title V Permit Condition 3.5.9

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 45 CSR§6-3.1(3.1e and 3.1.d State Enforceable Only) Open Burning – Title V Permit Condition 3.1.1 – *There are no applicable monitoring/testing/recordkeeping or reporting requirements.*
- 45 CSR§6-3.2 Open Burning Exemptions – Title V Permit Condition 3.1.2 – *There are no applicable monitoring/testing/recordkeeping or reporting requirements.*
- 40 CFR Part 61.145(b) and 45CSR 15 - Asbestos – Title V Permit Condition 3.1.3 – *Testing reporting, and recordkeeping performed when applicable.*
- 45 CSR§4-3.1 (State Enforceable Only) Odor – Title V Permit Condition 3.1.4 - *There are no applicable monitoring/testing/recordkeeping or reporting requirements.*
- 45 CSR§11-5.2 Standby Plan for Reducing Emissions – Title V Permit Condition 3.1.5 –*A plan will be prepared if requested by the Department.*

-WV Code § 22-5-4(a) (14) Emission Inventory – Title V Permit Condition 3.1.6 – *Emission inventory submitted annually, as required.*

-40 CFR part 82, Subpart F Ozone Depleting Substances – Title V Permit Condition 3.1.7 – *Testing, reporting, and recordkeeping performed when applicable.*

-40 CFR Part 68 – Risk Management Plan – Title V Permit Condition 3.1.8 – *A Risk management Plan will be submitted if required by the date specified in 40 C.F.R. § 68.10.*

-Permit No. R13-2379B Condition C.3 - Operate in Accordance with Permit – Title V Permit Condition 3.1.9- *The facility's construction and operation is in accordance with the specified permits.*

-WV Code § 22-5-4(a) (15) and 45 CSR 13 – Stack Testing – Title V Permit Condition 3.3.1 – *Testing will be performed to determine compliance with the emission limitations set forth in the permit. Report of the stack test results will be submitted within 60 days of completion of the test.*

-45 CSR § 30-5.1.c.2.A – Monitoring Information – Title V Permit Condition 3.4.1 – *Records of monitoring information will be maintained as applicable.*

-45 CSR § 30-5.1.c.2.B – Retention of records – Title V permit Condition 3.4.2 – *Records of all required monitoring data and supporting information will be retained for at least 5 years.*

-45 CSR § 30-5.1.c. (State Enforceable Only) - Odor – Title V Permit Condition 3.4.3 – *Records of all odor complaints received and any investigation and responsive action performed in response to the complaint will be maintained.*

-45 CSR § 30-4.4 and 5.1.c.3.D. - Responsible Official - Title V Permit Condition 3.5.1- *There are no applicable monitoring/testing/recordkeeping or reporting required.*

-45 CSR § 30-5.1.c.3.E. - Confidentiality - Title V Permit Condition 3.5.2 – *There are no applicable monitoring/testing/recordkeeping or reporting requirements.*

-45 CSR § 30-8. - Certified Emissions Statement - Title V Permit Condition 3.5.4 – *Certified emissions statement and fees will be submitted annually.*

-45 CSR § 30-5.3.e - Compliance Certification - Title V Permit Condition 3.5.5 – *The annual certification of compliance will be submitted to the DAQ and USEPA on or before March 15 of each year. A copy of the certification will be maintained on site for five years.*

-45 CSR § 30-5.1.c.3.A. - Semi-Annual Monitoring Reports – Title V Permit Condition 3.5.6 - *Submit semi-annual compliance reports 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.*

-45 CSR § 30-5.7.a through e. Emergencies - Title V Permit Condition 3.5.7 – *Recordkeeping and reporting will be performed as required and when applicable.*

-45 CSR § 30-5.1.c.3.B through C. - Deviations - Title V Permit Condition 3.5.8 – *Reporting of deviations from the permit requirements will be performed when applicable and as requirements.*

-45 CSR § 30-4.3.h.1.B New Applicable Requirements - Title V Permit Condition 3.5.9 – *Testing, reporting, and recordkeeping performed when applicable, and as required.*

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	22.24
Nitrogen Oxides (NO _x)	28.17
Lead (Pb)	<0.01
Particulate Matter (PM _{2.5}) ¹	7.42
Particulate Matter (PM ₁₀) ¹	7.42
Total Particulate Matter (TSP)	7.42
Sulfur Dioxide (SO ₂)	0.152
Volatile Organic Compounds (VOC)	48.556
Hazardous Air Pollutants ²	Potential Emissions
HAPs from Boiler#5	0.07
Methyl Isobutyl Ketone	1.46
Isophorone	2.93
Ethylbenzene	1.94
Formaldehyde	0.37
Hexane	0.008
Cumene	0.37
Naphthalene	2.07
Xylene	6.51
Regulated Pollutants other than Criteria and HAP	Potential Emissions

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input checked="" type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input checked="" type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input checked="" type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Mark Volkmann

Title: Environmental, Health & Safety Director

Responsible official's signature:

Signature: 

Signature Date: 3/13/2017

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s) (Included, but not applicable)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.vv.gov/dag, requested by phone (304) 926-0475, and/or obtained through the mail.



TITLE V COMPLETENESS CHECKLIST

**TITLE V PERMIT APPLICATION CHECKLIST
FOR ADMINISTRATIVE COMPLETENESS**

<p>A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a Title V permit application. Any submittal will be considered incomplete if the required information is not included.*</p>	
<input checked="" type="checkbox"/>	Two signed copies of the application (at least one <u>must</u> contain the original “ <i>Certification</i> ” page signed and dated in blue ink)
<input checked="" type="checkbox"/>	Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy)
<input checked="" type="checkbox"/>	*Table of Contents (needs to be included but not for administrative completeness)
<input checked="" type="checkbox"/>	Facility information
<input checked="" type="checkbox"/>	Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios
<input checked="" type="checkbox"/>	Area map showing plant location
<input checked="" type="checkbox"/>	Plot plan showing buildings and process areas
<input checked="" type="checkbox"/>	Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships
<input checked="" type="checkbox"/>	Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance
<input checked="" type="checkbox"/>	Listing of all active permits and consent orders (if applicable)
<input checked="" type="checkbox"/>	Facility-wide emissions summary
<input checked="" type="checkbox"/>	Identification of Insignificant Activities
<input checked="" type="checkbox"/>	ATTACHMENT D - Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities
<input checked="" type="checkbox"/>	ATTACHMENT E - Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the emission unit is not in compliance
<input checked="" type="checkbox"/>	ATTACHMENT G - Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)
<input checked="" type="checkbox"/>	ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the “Is the device subject to CAM?” question is answered “Yes” on the Air Pollution Control Device Form (ATTACHMENT G)
<input checked="" type="checkbox"/>	General Application Forms signed by a Responsible Official
<input type="checkbox"/>	Confidential Information submitted in accordance with 45CSR31



ATTACHMENT A

AREA MAP



Brooke Pioneer Trail

View Ave

Glendenen Ave

Jones Run

49 Hill Rd

Apple Pie Ridge

Apple Ave

Jupiter Aluminum Corporation

7

2

© 2016 Google

Goog

Imagery Date: 8/21/2015 40°12'54.71" N 80°39'00.78" W elev 1010 ft

1994



ATTACHMENT B

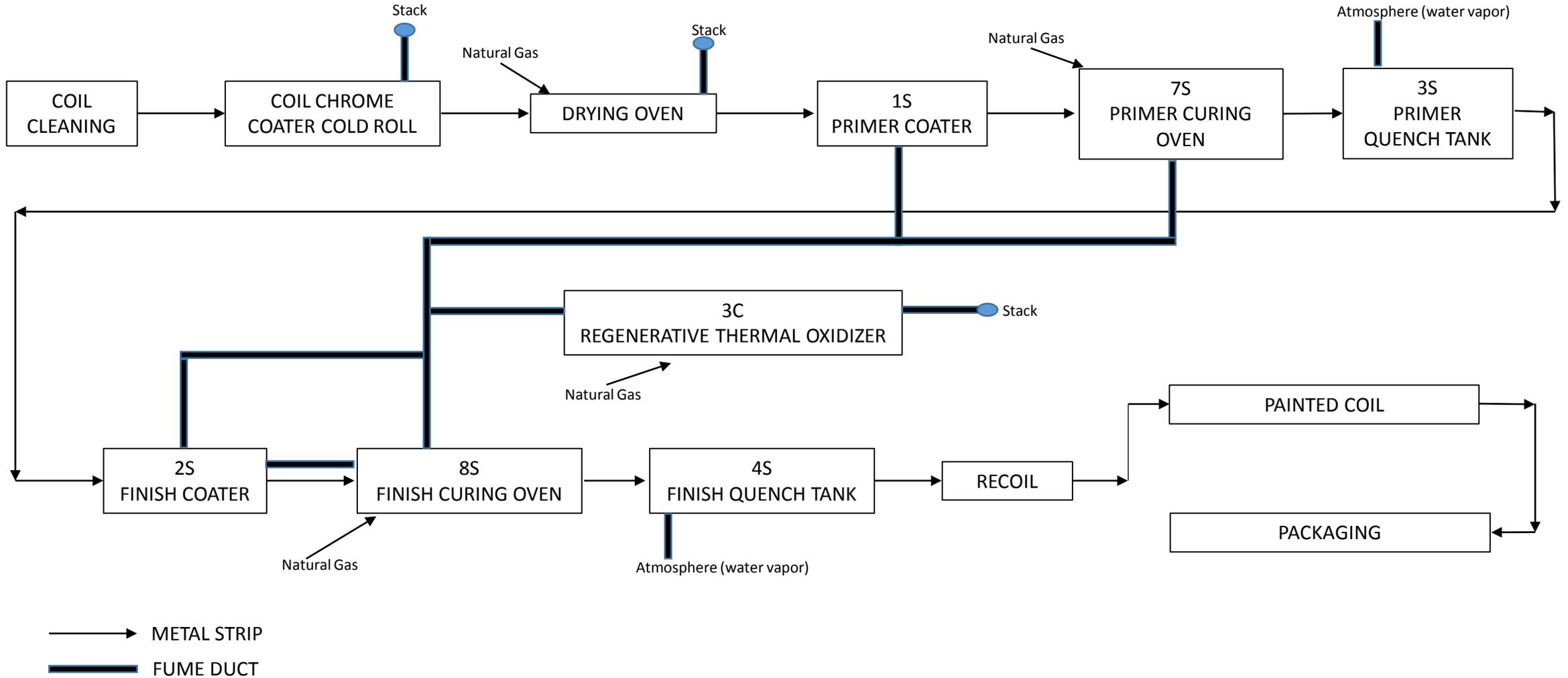
PLOT PLAN



ATTACHMENT C

PROCESS FLOW DIAGRAMS FOR COIL COATING LINE #1

JUPITER ALUMINUM BEECH BOTTOM PLANT- COIL COATING LINE 1 PROCESS FLOW DIAGRAM





ATTACHMENT D
TITLE V EQUIPMENT TABLE



ATTACHMENT E
EMISSIONS UNIT DATA SHEETS

ATTACHMENT E - Emission Unit Form

Emission Unit Description Boiler #5

Emission unit ID number: 003-05	Emission unit name: Boiler #5	List any control devices associated with this emission unit: None
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
One 8.65 MM Btu/hour Cleaver-Brooks natural gas-fired boiler used primarily to provide steam to heat various coating line cleaning tanks.

Manufacturer: Cleaver-Brooks	Model number: CB 200-150	Serial number: 92340
Construction date: 1987	Installation date: 08/01/2013	Modification date(s): NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 8.65 MMBtu/hr

Maximum Hourly Throughput: 8,650 cu.ft/hr	Maximum Annual Throughput: 75.8x10 ⁶ cu.ft/yr	Maximum Operating Schedule: 8760 hours per year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
Maximum design heat input and/or maximum horsepower rating: 8.65 MMBtu/Hr	Type and Btu/hr rating of burners: 8.65 MMBtu/Hr

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural Gas

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	Negligible	Negligible	1,000 BTU/ft ³

Emissions Data

Criteria Pollutants	Potential Emissions
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	PPH	TPY
Carbon Monoxide (CO)	0.708	3.10
Nitrogen Oxides (NO _x)	0.843	3.69
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.06	0.28
Particulate Matter (PM ₁₀)	0.06	0.28
Total Particulate Matter (TSP)	0.06	0.28
Sulfur Dioxide (SO ₂)	0.005	0.022
Volatile Organic Compounds (VOC)	0.05	0.20
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAPs	0.016	0.07
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Nitrous Oxide (N ₂ O)	0.002	0.01
Methane (CH ₄)	0.02	0.08
Carbon Dioxide (CO ₂)	1,009.73	4,422.63
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Potential annual emissions are based on an operating schedule of 8,760 hr/yr Emission factors for CO₂, N₂O and CH₄ are taken from Table C-1 and Table C-2 to Subpart C of Part 98.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or **construction permit** with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

These requirements are pending, as the NSR Permit and Title V Modification Application to include the 8.65 MMBtu/hr boiler submitted in August 2016 is still under review by the Department:

- 45 CSR § 2-3.1 Opacity
- 45 CSR § 2-4.1.b Particulate Emission Limit
- 45 CSR § 2-9.2 Control Practices
- 45 CSR § 10-3.1e Sulfur Dioxide Limit
- 45 CSR§2A-7.1.a Recordkeeping

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

These requirements are pending, as the NSR Permit and Title V Modification Application to include the 8.65 MMBtu/hr boiler submitted in August 2016 is still under review by the Department:

- 45 CSR § 2-3.1 Opacity– Condition met by firing natural gas only and recordkeeping
- 45 CSR § 45-2-4.1.b Particulate Emission Limit - Condition met by firing natural gas only and recordkeeping
- 45 CSR § 45-2-9.2 Control Practices - Condition met by firing natural gas only and recordkeeping
- 45 CSR § 45-10-3.1e Sulfur Dioxide Limit - Condition met by firing natural gas only and recordkeeping
- 45 CSR§2A-7.1.a Recordkeeping– Condition met by maintaining records of operating schedule, and quality and quantity of fuel burned. Records will include date and time of start-up and shutdown, and quantity of fuel consumed on a monthly basis.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Coil Coating Line #1

Emission unit ID number: 001-01, 001-02, 1S, 2S, 7S, 8S	Emission unit name: Surface Cleaning Section, Drying Oven, Primer Coater, Primer Bake Oven, Finish Bake Oven	List any control devices associated with this emission unit: Regenerative Thermal Oxidizer
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

A series of cleaning tanks is used to clean the metal before the application of primer and finish coatings. The cleaning tanks include three hot rinse tanks, cold rinse, phosphoric acid rinse, zinc phosphatizing, cleaner, brush machine, and pre-clean tanks. This process is followed by a drying oven. A primer and finish oven system is then used to apply the desired coating to the metal strip. A "Regenerative Thermal Oxidizer" (RTO) is used to control emissions from Coil Coating Line #1. The quenching, coating room, and oven emissions for both the primer and finish sections are destroyed by the new RTO.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
Construction date: 01/01/1960	Installation date: 01/01/1960	Modification date(s): 05/15/2005

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
200,000 tons of coated metal/year

Maximum Hourly Throughput: 60 gallons per hour	Maximum Annual Throughput: 200,000 tons coated metal per year	Maximum Operating Schedule: 8760 hours per year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: Drying Oven – 4 MCF/hour Primer Curing Oven – 15 MCF/hour Finish Curing Oven – 15 MCF/hour RTO – 18 MCF/hour	Type and Btu/hr rating of burners: Drying Oven – 4 MMbtu/hr Primer Curing Oven – (3) 5 MMbtu/hr Finish Curing Oven – (3) 5 MMbtu/hr RTO – (2) 9 MMbtu/hr
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
 Primary = Natural Gas - 48,000 ft³/hr and 420,480,000 ft³/yr for primer curing oven, finish curing oven, and RTO
 Primary = Natural Gas – 4,000 ft³/hr and 35,040 ft³/yr for drying oven only
 Secondary = None

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	Negligible	Negligible	1,000

Emissions Data (For Regenerative Thermal Oxidizer Stack- Emission Point 11E)

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	4.03	17.65
Nitrogen Oxides (NO _x)	5.16	22.6
Lead (Pb)	<0.01	<0.01
Particulate Matter (PM _{2.5})	1.6	7.01
Particulate Matter (PM ₁₀)	1.6	7.01
Total Particulate Matter (TSP)	1.6	7.01
Sulfur Dioxide (SO ₂)	0.028	0.12
Volatile Organic Compounds (VOC)	11.02	48.27
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Methyl Isobutyl Ketone	1.04	1.46
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Formaldehyde	0.26	0.37
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Note 1 - Emissions factors are from AP-42 for natural gas combustion. Emission factors for the coating solvents are mass balance done on MSDS weight percent for individual components. The VOC emission factor and control efficiency for the RTO are from the construction application. Jupiter does not have the manufacturer specifications.

Note 2 – The ton per year potential emissions are from the emission limits for CCL #1 as set forth in Permit No. R30 -009000024-2012 (1 of 2), item 5.1.11

Emissions Data (For Drying Oven Stack on Coil Coating Line #1)		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.34	1.49
Nitrogen Oxides (NO _x)	0.43	1.88
Lead (Pb)	<0.01	<0.01
Particulate Matter (PM _{2.5})	0.03	0.13
Particulate Matter (PM ₁₀)	0.03	0.13
Total Particulate Matter (TSP)	0.03	0.13
Sulfur Dioxide (SO ₂)	<0.01	0.01
Volatile Organic Compounds (VOC)	0.022	0.096
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Emissions factors are from AP-42 for natural gas combustion.</p>		
<p>Applicable Requirements</p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>- 45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.3 (11E) Opacity Restriction (3C) – Title V Permit Condition 5.1.1 -45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.4 (11E) Start-up Opacity Restriction (3C) - Title V Permit Condition 5.1.2 -45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.1 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.3 -45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.2 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.4 -45 CSR 13, Permit No. R13-2379- (Condition B.1) 45 CSR § 6-4.1(11E) Particulate Matter Emission Limit - Title</p>		

V Permit Condition 5.1.5

- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-4.1 (Coating Line #1) Particulate Matter Emission Limit - Title V Permit Condition 5.1.6
- 45 CSR § 10-4.1(001-02, 11E) Sulfur Dioxide Limit - Title V Permit Condition 5.1.7
- 45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i)(B), and 40CFR§63.5121(a).(3C) - Title V Permit Condition 5.1.8
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (11E) - Title V Permit Condition 5.1.9
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5120(a). (11E) Title V Permit Condition 5.1.10
- 45 CSR 13, Permit No. R13-2379- (Condition A.6.) (11E) Emission Limits - Title V Permit Condition 5.1.11
- 45 CSR 13, Permit No. R13-2379- (Condition A.7. and B.1.), 45CSR16, 40CFR§60.462(a) (11E) – Control of VOC emissions - Title V Permit Condition 5.1.12
- 45 CSR 13, Permit No. R13-2379- (Condition A.8.)(11E) – Operational Requirements and Natural Gas Use Only Restriction - Title V Permit Condition 5.1.13
- 45 CSR 13, Permit No. R13-2379- (Condition A.9.)(11E, 7S, 8S) – Natural Gas Quantity Limits - Title V Permit Condition 5.1.14
- 45 CSR 13, Permit No. R13-2379- (Condition A.10.) – Use of new surface coatings - Title V Permit Condition 5.1.15
- 45 CSR 13, Permit No. R13-2379- (Condition A.11.) – Coating Room Capture Efficiency - Title V Permit Condition 5.1.16
- 45 CSR 13, Permit No. R13-2379- (Condition A.12.) - Paint Usage Records - Title V Permit Condition 5.1.17
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45CSR§7-5.1 – Minimize fugitive emissions - Title V Permit Condition 5.1.18
- 45 CSR § 30-5.1.c.(11E) Visual Emission Checks - Title V Permit Condition 5.2.1
- 45 CSR § 7A-2.1.a,b (001-02) Visual Emission Checks - Title V Permit Condition 5.2.2
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(3), 40CFR§63.5121(a). (11E) – Temperature Monitoring Requirements - Title V Permit Condition 5.2.3
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5150(a)(4). (11E) – Capture System and Capture System Monitoring Plan - Title V Permit Condition 5.2.4
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170. (11E) – Compliant Coatings and/or Capture System Requirements - Title V Permit Condition 5.2.5
- 45 CSR § 30-5.1.c.- Compliance with 5.1.16 through pressure drop - Title V Permit Condition 5.2.6
- 45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., B.8., and B.9.), 45CSR16, 40CFR§60.463.(11E) – Performance Testing - Title V Permit Condition 5.3.1
- 45 CSR 13, Permit No. R13-2379 - (Condition B.1.), 45CSR34, 40CFR§63.5160(e). (11E) – Capture Efficiency - Title V Permit Condition 5.3.2
- 45CSR§30-5.1.c.(11E) – Fuel Recordkeeping - Title V Permit Condition 5.4.1
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), Subpart A, 40CFR§60.11(d) – Subpart TT Monitoring & Recordkeeping Reqs. - Title V Permit Condition 5.4.2
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5190(a) – Detailed Coating Records – Title V Permit Condition 5.4.3
- 45 CSR 13, Permit No. R13-2379- (Condition B.10) – Coating Records and VOC/HAP Reporting - Title V Permit Condition 5.4.4
- 45 CSR 13, Permit No. R13-2379- (Condition B.11) – Operating Hours and Fuel Use Recordkeeping - Title V Permit Condition 5.4.5
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d) – Subpart TT Reporting - Title V Permit Condition 5.5.1
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5180(a) – SSM Reporting, Semi-Annual Compliance Reporting, and Deviation Reporting - Title V Permit Condition 5.5.2

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.3 (11E) Opacity Restriction (3C) – Title V Permit Condition 5.1.1 – *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.4 (11E) Start-up Opacity Restriction (3C) - Title V Permit Condition 5.1.2 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.1 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.3 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.2 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.4 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45 CSR § 6-4.1(11E) Particulate Matter Emission Limit - Title V Permit Condition 5.1.5 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-4.1 (Coating Line #1) Particulate Matter Emission Limit - Title V Permit Condition 5.1.6 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR § 10-4.1(001-02, 11E) Sulfur Dioxide Limit - Title V Permit Condition 5.1.7 - *The opacity restriction is met by firing natural gas, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i)(B), and 40CFR§63.5121(a).(3C) - RTO Combustion Chamber Temperature Requirements – Title V Permit Condition 5.1.8 -*The temperature requirements are met by continuous temperature monitoring*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (11E) - VOC Limits - Title V Permit Condition 5.1.9 – *VOCs are limited by use of Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5120(a). (11E)- HAP Limits - Title V Permit Condition 5.1.10 – *HAPs are limited by use of Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.6.) (11E) Emission Limits - Title V Permit Condition 5.1.11- *Emission Limits are met by using Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.7. and B.1.), 45CSR16, 40CFR§60.462 (11E) - Title V Permit Condition 5.1.12 - *Compliance with 40CFR§60.462(a) is met by using the Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.8.)(11E) – Operational Requirements and Natural Gas Use Only Restriction - Title V Permit Condition 5.1.13 – *Regenerative Thermal Oxidizer uses natural gas only and is used at all times that line is operating*

-45 CSR 13, Permit No. R13-2379- (Condition A.9.)(11E, 7S, 8S) – Natural Gas Quantity Limits - Title V Permit Condition 5.1.14 – *Natural gas use limits are met by monitoring and recordkeeping*

-45 CSR 13, Permit No. R13-2379- (Condition A.10.) – Use of new surface coatings - Title V Permit Condition 5.1.15 – *Requirements for use of new surface coatings is met by recordkeeping and reporting*

-45 CSR 13, Permit No. R13-2379- (Condition A.11.) – Coating Room Capture Efficiency - Title V Permit Condition 5.1.16 – *Capture efficiency requirement is met by design, construction, and operation of coating room*

-45 CSR 13, Permit No. R13-2379- (Condition A.12.) - Paint Usage Records - Title V Permit Condition 5.1.17 – *Requirements are met by maintaining records of the amount and type of coatings used*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45CSR§7-5.1 – Minimize fugitive emissions - Title V Permit Condition 5.1.18 – *Fugitive emissions are minimized by use of properly designed and maintained emissions control system*

-45 CSR § 30-5.1.c.(11E) Visual Emission Checks for Fugitives - Title V Permit Condition 5.2.1 – *Fugitive emissions are monitored as required*

-45 CSR § 7A-2.1.a,b (001-02) Visual Emission Checks from Emission Points- Title V Permit Condition 5.2.2 – *Visual emissions are monitored as required*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a) (3), 40CFR§63.5121(a). (11E) – Temperature Monitoring Requirements - Title V Permit Condition 5.2.3 – *Temperatures are continuously monitored and recorded with a calibrated device and maintained above 1450 degrees F*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5150(a) (4). (11E) – Capture System and Capture System Monitoring Plan - Title V Permit Condition 5.2.4 – *This requirement is met by using a capture*

system and Regenerative Thermal Oxidizer control device operated in accordance with a capture system monitoring plan

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170. (11E) – Compliant Coatings and/or Capture System Requirements - Title V Permit Condition 5.2.5 – *This requirement is met by use of a capture system and control device*

-45 CSR § 30-5.1.c.- Compliance with 5.1.16 through pressure drop- Title V Permit Condition 5.2.6- *Compliance with 5.1.16 will be shown by a pressure drop across the coating room of at least 0.007 inches of H2O. Pressure drop measurements to be taken at least 1/shift.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., B.8., and B.9.), 45CSR16, 40CFR§60.463.(11E) – Performance Testing - Title V Permit Condition 5.3.1 – *This requirement is met by an initial performance test followed by monthly calculation of VOC emissions as per 40CFR§60.463*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5160(e). (11E) – Capture Efficiency - Title V Permit Condition 5.3.2 – *This requirement has been met by performing an initial performance demonstration test.*

-45CSR§30-5.1.c.(11E) – Fuel Recordkeeping - Title V Permit Condition 5.4.1 – *This requirement is met by using natural gas and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), Subpart A, 40CFR§60.11(d) – Subpart TT Monitoring & Recordkeeping Rqts. - Title V Permit Condition 5.4.2 – *These requirements are met by monitoring and recordkeeping of combustion temperatures, proper operation of air pollution control equipment, and monthly coatings use*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5190(a) – Detailed Coating Records – Title V Permit Condition 5.4.3 – *This requirement is met by keeping detailed records of coating line operation and coating useage*

-45 CSR 13, Permit No. R13-2379- (Condition B.10) – Coating Records and VOC/HAP Reporting - Title V Permit Condition 5.4.4 - *This requirement is met by keeping detailed records of coating useage and monthly reporting*

-45 CSR 13, Permit No. R13-2379- (Condition B.11) – Operating Hours and Fuel Use Recordkeeping - Title V Permit Condition 5.4.5 – *This requirement is met by monitoring and recordkeeping*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d) – Subpart TT Reporting - Title V Permit Condition 5.5.1 – *This requirement is met by quarterly/semi-annual reporting as appropriate*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5180(a) – SSM Reporting, Semi-Annual Compliance Reporting, and Deviation Reporting - Title V Permit Condition 5.5.2 – *These requirements are met by using a Regenerative Thermal Oxidizer and submitting Start-up, Shutdown, & Malfunction Reports as required and submitting semi-annual compliance reports as required*

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.



ATTACHMENT F
SCHEDULE COMPLIANCE FORM

ATTACHMENT E - Emission Unit Form

Emission Unit Description Coil Coating Line #1

Emission unit ID number: 001-01, 001-02, 1S, 2S, 7S, 8S	Emission unit name: Surface Cleaning Section, Drying Oven, Primer Coater, Primer Bake Oven, Finish Bake Oven	List any control devices associated with this emission unit: Regenerative Thermal Oxidizer
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

A series of cleaning tanks is used to clean the metal before the application of primer and finish coatings. The cleaning tanks include three hot rinse tanks, cold rinse, phosphoric acid rinse, zinc phosphatizing, cleaner, brush machine, and pre-clean tanks. This process is followed by a drying oven. A primer and finish oven system is then used to apply the desired coating to the metal strip. A "Regenerative Thermal Oxidizer" (RTO) is used to control emissions from Coil Coating Line #1. The quenching, coating room, and oven emissions for both the primer and finish sections are destroyed by the new RTO.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
Construction date: 01/01/1960	Installation date: 01/01/1960	Modification date(s): 05/15/2005

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
200,000 tons of coated metal/year

Maximum Hourly Throughput: 60 gallons per hour	Maximum Annual Throughput: 200,000 tons coated metal per year	Maximum Operating Schedule: 8760 hours per year
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: Drying Oven – 4 MCF/hour Primer Curing Oven – 15 MCF/hour Finish Curing Oven – 15 MCF/hour RTO – 18 MCF/hour	Type and Btu/hr rating of burners: Drying Oven – 4 MMbtu/hr Primer Curing Oven – (3) 5 MMbtu/hr Finish Curing Oven – (3) 5 MMbtu/hr RTO – (2) 9 MMbtu/hr
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
 Primary = Natural Gas - 48,000 ft³/hr and 420,480,000 ft³/yr for primer curing oven, finish curing oven, and RTO
 Primary = Natural Gas – 4,000 ft³/hr and 35,040 ft³/yr for drying oven only
 Secondary = None

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	Negligible	Negligible	1,000

Emissions Data (For Regenerative Thermal Oxidizer Stack- Emission Point 11E)

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	4.03	17.65
Nitrogen Oxides (NO _x)	5.16	22.6
Lead (Pb)	<0.01	<0.01
Particulate Matter (PM _{2.5})	1.6	7.01
Particulate Matter (PM ₁₀)	1.6	7.01
Total Particulate Matter (TSP)	1.6	7.01
Sulfur Dioxide (SO ₂)	0.028	0.12
Volatile Organic Compounds (VOC)	11.02	48.27
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Methyl Isobutyl Ketone	1.04	1.46
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Formaldehyde	0.26	0.37
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Note 1 - Emissions factors are from AP-42 for natural gas combustion. Emission factors for the coating solvents are mass balance done on MSDS weight percent for individual components. The VOC emission factor and control efficiency for the RTO are from the construction application. Jupiter does not have the manufacturer specifications.

Note 2 – The ton per year potential emissions are from the emission limits for CCL #1 as set forth in Permit No. R30 -009000024-2012 (1 of 2), item 5.1.11

Emissions Data (For Drying Oven Stack on Coil Coating Line #1)		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.34	1.49
Nitrogen Oxides (NO _x)	0.43	1.88
Lead (Pb)	<0.01	<0.01
Particulate Matter (PM _{2.5})	0.03	0.13
Particulate Matter (PM ₁₀)	0.03	0.13
Total Particulate Matter (TSP)	0.03	0.13
Sulfur Dioxide (SO ₂)	<0.01	0.01
Volatile Organic Compounds (VOC)	0.022	0.096
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Emissions factors are from AP-42 for natural gas combustion.</p>		
<p>Applicable Requirements</p> <p>List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.</p> <p>- 45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.3 (11E) Opacity Restriction (3C) – Title V Permit Condition 5.1.1 -45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.4 (11E) Start-up Opacity Restriction (3C) - Title V Permit Condition 5.1.2 -45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.1 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.3 -45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.2 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.4 -45 CSR 13, Permit No. R13-2379- (Condition B.1) 45 CSR § 6-4.1(11E) Particulate Matter Emission Limit - Title</p>		

V Permit Condition 5.1.5

- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-4.1 (Coating Line #1) Particulate Matter Emission Limit - Title V Permit Condition 5.1.6
- 45 CSR § 10-4.1(001-02, 11E) Sulfur Dioxide Limit - Title V Permit Condition 5.1.7
- 45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i)(B), and 40CFR§63.5121(a).(3C) - Title V Permit Condition 5.1.8
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (11E) - Title V Permit Condition 5.1.9
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5120(a). (11E) Title V Permit Condition 5.1.10
- 45 CSR 13, Permit No. R13-2379- (Condition A.6.) (11E) Emission Limits - Title V Permit Condition 5.1.11
- 45 CSR 13, Permit No. R13-2379- (Condition A.7. and B.1.), 45CSR16, 40CFR§60.462(a) (11E) – Control of VOC emissions - Title V Permit Condition 5.1.12
- 45 CSR 13, Permit No. R13-2379- (Condition A.8.)(11E) – Operational Requirements and Natural Gas Use Only Restriction - Title V Permit Condition 5.1.13
- 45 CSR 13, Permit No. R13-2379- (Condition A.9.)(11E, 7S, 8S) – Natural Gas Quantity Limits - Title V Permit Condition 5.1.14
- 45 CSR 13, Permit No. R13-2379- (Condition A.10.) – Use of new surface coatings - Title V Permit Condition 5.1.15
- 45 CSR 13, Permit No. R13-2379- (Condition A.11.) – Coating Room Capture Efficiency - Title V Permit Condition 5.1.16
- 45 CSR 13, Permit No. R13-2379- (Condition A.12.) - Paint Usage Records - Title V Permit Condition 5.1.17
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45CSR§7-5.1 – Minimize fugitive emissions - Title V Permit Condition 5.1.18
- 45 CSR § 30-5.1.c.(11E) Visual Emission Checks - Title V Permit Condition 5.2.1
- 45 CSR § 7A-2.1.a,b (001-02) Visual Emission Checks - Title V Permit Condition 5.2.2
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(3), 40CFR§63.5121(a). (11E) – Temperature Monitoring Requirements - Title V Permit Condition 5.2.3
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5150(a)(4). (11E) – Capture System and Capture System Monitoring Plan - Title V Permit Condition 5.2.4
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170. (11E) – Compliant Coatings and/or Capture System Requirements - Title V Permit Condition 5.2.5
- 45 CSR § 30-5.1.c.- Compliance with 5.1.16 through pressure drop - Title V Permit Condition 5.2.6
- 45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., B.8., and B.9.), 45CSR16, 40CFR§60.463.(11E) – Performance Testing - Title V Permit Condition 5.3.1
- 45 CSR 13, Permit No. R13-2379 - (Condition B.1.), 45CSR34, 40CFR§63.5160(e). (11E) – Capture Efficiency - Title V Permit Condition 5.3.2
- 45CSR§30-5.1.c.(11E) – Fuel Recordkeeping - Title V Permit Condition 5.4.1
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), Subpart A, 40CFR§60.11(d) – Subpart TT Monitoring & Recordkeeping Reqts. - Title V Permit Condition 5.4.2
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5190(a) – Detailed Coating Records – Title V Permit Condition 5.4.3
- 45 CSR 13, Permit No. R13-2379- (Condition B.10) – Coating Records and VOC/HAP Reporting - Title V Permit Condition 5.4.4
- 45 CSR 13, Permit No. R13-2379- (Condition B.11) – Operating Hours and Fuel Use Recordkeeping - Title V Permit Condition 5.4.5
- 45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d) – Subpart TT Reporting - Title V Permit Condition 5.5.1
- 45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5180(a) – SSM Reporting, Semi-Annual Compliance Reporting, and Deviation Reporting - Title V Permit Condition 5.5.2

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.3 (11E) Opacity Restriction (3C) – Title V Permit Condition 5.1.1 – *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1), 45 CSR § 6-4.4 (11E) Start-up Opacity Restriction (3C) - Title V Permit Condition 5.1.2 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.1 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.3 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-3.2 (001-02, 11E) Opacity Restriction - Title V Permit Condition 5.1.4 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45 CSR § 6-4.1(11E) Particulate Matter Emission Limit - Title V Permit Condition 5.1.5 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45 CSR § 7-4.1 (Coating Line #1) Particulate Matter Emission Limit - Title V Permit Condition 5.1.6 - *The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.*

-45 CSR § 10-4.1(001-02, 11E) Sulfur Dioxide Limit - Title V Permit Condition 5.1.7 - *The opacity restriction is met by firing natural gas, and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i)(B), and 40CFR§63.5121(a).(3C) - RTO Combustion Chamber Temperature Requirements – Title V Permit Condition 5.1.8 -*The temperature requirements are met by continuous temperature monitoring*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (11E) - VOC Limits - Title V Permit Condition 5.1.9 – *VOCs are limited by use of Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5120(a). (11E)- HAP Limits - Title V Permit Condition 5.1.10 – *HAPs are limited by use of Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.6.) (11E) Emission Limits - Title V Permit Condition 5.1.11- *Emission Limits are met by using Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.7. and B.1.), 45CSR16, 40CFR§60.462 (11E) - Title V Permit Condition 5.1.12 - *Compliance with 40CFR§60.462(a) is met by using the Regenerative Thermal Oxidizer*

-45 CSR 13, Permit No. R13-2379- (Condition A.8.)(11E) – Operational Requirements and Natural Gas Use Only Restriction - Title V Permit Condition 5.1.13 – *Regenerative Thermal Oxidizer uses natural gas only and is used at all times that line is operating*

-45 CSR 13, Permit No. R13-2379- (Condition A.9.)(11E, 7S, 8S) – Natural Gas Quantity Limits - Title V Permit Condition 5.1.14 – *Natural gas use limits are met by monitoring and recordkeeping*

-45 CSR 13, Permit No. R13-2379- (Condition A.10.) – Use of new surface coatings - Title V Permit Condition 5.1.15 – *Requirements for use of new surface coatings is met by recordkeeping and reporting*

-45 CSR 13, Permit No. R13-2379- (Condition A.11.) – Coating Room Capture Efficiency - Title V Permit Condition 5.1.16 – *Capture efficiency requirement is met by design, construction, and operation of coating room*

-45 CSR 13, Permit No. R13-2379- (Condition A.12.) - Paint Usage Records - Title V Permit Condition 5.1.17 – *Requirements are met by maintaining records of the amount and type of coatings used*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.3.), 45CSR§7-5.1 – Minimize fugitive emissions - Title V Permit Condition 5.1.18 – *Fugitive emissions are minimized by use of properly designed and maintained emissions control system*

-45 CSR § 30-5.1.c.(11E) Visual Emission Checks for Fugitives - Title V Permit Condition 5.2.1 – *Fugitive emissions are monitored as required*

-45 CSR § 7A-2.1.a,b (001-02) Visual Emission Checks from Emission Points- Title V Permit Condition 5.2.2 – *Visual emissions are monitored as required*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a) (3), 40CFR§63.5121(a). (11E) – Temperature Monitoring Requirements - Title V Permit Condition 5.2.3 – *Temperatures are continuously monitored and recorded with a calibrated device and maintained above 1450 degrees F*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5150(a) (4). (11E) – Capture System and Capture System Monitoring Plan - Title V Permit Condition 5.2.4 – *This requirement is met by using a capture*

system and Regenerative Thermal Oxidizer control device operated in accordance with a capture system monitoring plan

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170. (11E) – Compliant Coatings and/or Capture System Requirements - Title V Permit Condition 5.2.5 – *This requirement is met by use of a capture system and control device*

-45 CSR § 30-5.1.c.- Compliance with 5.1.16 through pressure drop- Title V Permit Condition 5.2.6- *Compliance with 5.1.16 will be shown by a pressure drop across the coating room of at least 0.007 inches of H₂O. Pressure drop measurements to be taken at least 1/shift.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1., B.5., B.8., and B.9.), 45CSR16, 40CFR§60.463.(11E) – Performance Testing - Title V Permit Condition 5.3.1 – *This requirement is met by an initial performance test followed by monthly calculation of VOC emissions as per 40CFR§60.463*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5160(e). (11E) – Capture Efficiency - Title V Permit Condition 5.3.2 – *This requirement has been met by performing an initial performance demonstration test.*

-45CSR§30-5.1.c.(11E) – Fuel Recordkeeping - Title V Permit Condition 5.4.1 – *This requirement is met by using natural gas and maintaining the proper records.*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), Subpart A, 40CFR§60.11(d) – Subpart TT Monitoring & Recordkeeping Rqts. - Title V Permit Condition 5.4.2 – *These requirements are met by monitoring and recordkeeping of combustion temperatures, proper operation of air pollution control equipment, and monthly coatings use*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5190(a) – Detailed Coating Records – Title V Permit Condition 5.4.3 – *This requirement is met by keeping detailed records of coating line operation and coating useage*

-45 CSR 13, Permit No. R13-2379- (Condition B.10) – Coating Records and VOC/HAP Reporting - Title V Permit Condition 5.4.4 - *This requirement is met by keeping detailed records of coating useage and monthly reporting*

-45 CSR 13, Permit No. R13-2379- (Condition B.11) – Operating Hours and Fuel Use Recordkeeping - Title V Permit Condition 5.4.5 – *This requirement is met by monitoring and recordkeeping*

-45 CSR 13, Permit No. R13-2379- (Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d) – Subpart TT Reporting - Title V Permit Condition 5.5.1 – *This requirement is met by quarterly/semi-annual reporting as appropriate*

-45 CSR 13, Permit No. R13-2379- (Condition B.1.), 45CSR34, 40CFR§63.5180(a) – SSM Reporting, Semi-Annual Compliance Reporting, and Deviation Reporting - Title V Permit Condition 5.5.2 – *These requirements are met by using a Regenerative Thermal Oxidizer and submitting Start-up, Shutdown, & Malfunction Reports as required and submitting semi-annual compliance reports as required*

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.



ATTACHMENT G
AIR POLLUTION CONTROL DEVICE FORM

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 3C/Stack 11E	List all emission units associated with this control device. Coil Coating line #1 – Primer Coating Room (1S), Finish Coating Room (2S), Primer Curing Oven (7S), and Finish Curing Oven (8S)	
Manufacturer: Epcon	Model number: NA	Installation date: 04/17/2005

Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) <u>Regenerative Thermal Oxidizer</u>
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	100%	>90%
HAPS	100%	>90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Regenerative Thermal Oxidizer (RTO) has three chambers and handles approximately 85,800 acfm at a velocity of approximately 113.85 feet per second. The RTO fires only natural gas and operates at a temperature of 1,450 degrees Fahrenheit (as a 3-hour average). This information is from the original construction application. Jupiter does not have vendor specifications.

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Per the Permit Shield under Section 3.7.2 (g) of the existing Title V Permit (R30-00900004-2012), the agency has determined that the facility does not have pollutant-specific emissions units that have pre-control emissions greater than major source thresholds, and therefore, is not subject to CAM.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

A combination of the following items are performed:

- Regenerative Thermal Oxidizer operated during all CCL#1 operations, any deviations are reported
- Strictly fire natural gas
- Recordkeeping
- Reporting



ATTACHMENT H

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN FORM

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): YES NO

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is **NOT** exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
 - d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
 - e. The PSEU is **NOT** an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has **NOT** yet been approved need to be addressed in this CAM plan submittal.

INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, **Only** address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU in order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	^b EMISSION LIMITATION or STANDARD	^c MONITORING REQUIREMENT
<u>EXAMPLE</u> Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation:	4b) Pollutant:	4c) ^a Indicator No. 1:	4d) ^a Indicator No. 2:
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:			
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:			
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:			
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
^d Provide the <u>MONITORING FREQUENCY</u> :			
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:			
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:			

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of **EACH** indicator and monitoring approach and **EACH** indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:

6b) Regulated Air Pollutant:

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

8) **INDICATOR RANGES:** Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a **COMPLIANCE OR PERFORMANCE TEST**, a **TEST PLAN AND SCHEDULE**, or by **ENGINEERING ASSESSMENTS**. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- **COMPLIANCE OR PERFORMANCE TEST** (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall **INCLUDE** a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- **TEST PLAN AND SCHEDULE** (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall **INCLUDE** the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- **ENGINEERING ASSESSMENTS** (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall **INCLUDE** documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION: