



**Precoat Metals**

a division of Sequa Corporation

4502 Freedom Way  
Weirton, WV 26062  
301 794 1557  
[www.precoatmetals.com](http://www.precoatmetals.com)

November 1, 2017

Mr. William F. Durham  
Director  
WV Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

Sub: Title V Permit Renewal Application  
Permit # R30-00900054-2013  
Precoat Metals, Weirton Plant

Dear Mr. Durham:

Enclosed please find two hard copies (an original and a copy) and two electronic copies on CDs of Title V Permit Renewal Application for Precoat Metals facility located at 4502 Freedom Way, Weirton, WV 26062. Precoat Metals operates a coil coating facility in Weirton operating under Permit # R30-00900054-2013.

Please contact me with any questions or comments at (304) 794-3009 or by e-mail at [joseph\\_rupp@precoat.com](mailto:joseph_rupp@precoat.com)

Sincerely,

Joseph Rupp  
EHS Manager

**SEQUA**

Plants: | St. Louis, MO | Granite City, IL | Houston, TX | Jackson, MS | Portage, IN | Birmingham, AL | Baltimore, MD |  
| Hawesville, KY | Armoret, AR | Greenfield, IN | Kingsbury, IN | Weirton, WV | Columbia, SC |

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

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.\*

<input 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 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 checked="" type="checkbox"/>	Confidential Information submitted in accordance with 45CSR31 <span style="color: blue;">N/A</span>

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## Item

Application for Title V Permit Renewal

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3. Facility Wide Emissions
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Attachment B - Plot Plan

Attachment C - Process Flow Diagram

Attachment D – Equipment Units Table

Attachment E – Emission Unit Forms

Attachment F – Schedule of Compliance Forms

Attachment G – Air Pollution Control Device Form

Attachment H – Compliance Assurance Monitoring (CAM) Plan Form

Attachment R—Authority of Corporation or Other Business Entity Form



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

1. Name of Applicant (As registered with the WV Secretary of State's Office): Precoat Metals
2. Facility Name or Location: Precoat Metals, 4502 Freedom Way, Weirton, WV 26062
3. DAQ Plant ID No.: 03-54-00900054
4. Federal Employer ID No. (FEIN): 35-0901870
5. Permit Application Type: [X] Permit Renewal, When did operations commence? 06/01/1997, What is the expiration date of the existing permit? 06/18/2018
6. Type of Business Entity: [X] Corporation, [ ] Governmental Agency, [ ] LLC, [ ] Partnership, [ ] Limited Partnership
7. Is the Applicant the: [ ] Owner, [X] Operator, [ ] Both
8. Number of onsite employees: 72
9. Governmental Code: [X] Privately owned and operated; 0, [ ] County government owned and operated; 3, [ ] Federally owned and operated; 1, [ ] Municipality government owned and operated; 4, [ ] State government owned and operated; 2, [ ] District government owned and operated; 5
10. Business Confidentiality Claims: Does this application include confidential information (per 45CSR31)? [ ] Yes, [X] No

<b>11. Mailing Address</b>		
Street or P.O. Box: 4502 Freedom Way,		
City: Weirton	State: WV	Zip: 26062
Telephone Number: (304) 794-3009	Fax Number: (304) 794- 3017	

<b>12. Facility Location</b>		
Street: 4502 Freedom Way	City: Weirton	County: WV
UTM Easting: 534.83 km	UTM Northing: 4,474.18 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<b>Directions:</b> From Wheeling, WV—Take Route WV 2 North. Travel 22 miles and merge on to US 22 East. Take Exit 2 (Main Street) Towards Downtown Weirton. Turn Left on Freedom Way. Precoat Metals is on the Left		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
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 Area <sup>1</sup> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area <sup>1</sup> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<sup>1</sup> 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.		

<b>13. Contact Information</b>		
<b>Responsible Official:</b> Scott Hollo		<b>Title:</b> Plant Manager
<b>Street or P.O. Box:</b> 4502 Freedom Way		
<b>City:</b> Weirton	<b>State:</b> WV	<b>Zip:</b> 26062
<b>Telephone Number:</b> (304) 794-3003		<b>Fax Number:</b> (304) 794-3017
<b>E-mail address:</b> scott_hollo@precoat.com		
<b>Environmental Contact:</b> Joseph Rupp		<b>Title:</b> EHS Manager
<b>Street or P.O. Box:</b> 4502 Freedom Way		
<b>City:</b> Weirton	<b>State:</b> WV	<b>Zip:</b> 26062
<b>Telephone Number:</b> (304) 794-3009		<b>Fax Number:</b> (304) 794-3017
<b>E-mail address:</b> joseph_rupp@precoat.com		
<b>Application Preparer:</b> Joseph Rupp		<b>Title:</b> EHS Manager
<b>Company:</b> Precoat Metals		
<b>Street or P.O. Box:</b> 4502 Freedom Way		
<b>City:</b> Weirton	<b>State:</b> WV	<b>Zip:</b> 26062
<b>Telephone Number:</b> (304)-794-3009		<b>Fax Number:</b> (304)-794-3017
<b>E-mail address:</b> joseph_rupp@precoat.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 Coil Coating	Coated Sheet Metal Coils	332812	3479

**Provide a general description of operations.**

Coil coating is a highly automated process for coating metal before fabrication. In one continuous process a coil of metal unwinds, and both the top and bottom sides are cleaned to remove residual carbon, oxides, dirt and oil and grease to expose the fresh metal surface for additional corrosion resistance treatment. The coil is chemically treated in the wet section followed by a rinse. The coil then passes through the prime coater, prime oven and prime quench followed by the finish coater, finish oven, and finish quench. The coil is then recoiled for shipment.

Primer and paints are applied in the Prime and Finish Coaters. The VOCs from the primer and paints come off in the ovens, and are captured and transported to the afterburner for destruction. The afterburner exhaust is sent to a waste heat exchanger on an as needed basis for heat recovery and steam generation.

Wastewater generated from the cleaning process and wet section is treated in an on-site wastewater pretreatment system prior to discharge to a city POTW.

The primary end user of the painted coils is the building products segment which includes manufactured housing, metal buildings, roofing, siding, garage doors and other architectural components.

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

**Section 2: Applicable Requirements**

<b>18. Applicable Requirements Summary</b>	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" 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/Reqs.	<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 <sub>x</sub> Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO <sub>2</sub> Trading Program (45CSR41)	

<b>19. Non Applicability Determinations</b>
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**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.**

CAM Rule (40CFR64): Precoat Metals is exempt from CAM rule. It operates under 40CFR Part 63 Subpart SSSS: NESHAP for Surface Coating of Metal Coils and 40CFR Part 60 Subpart TT: NSPS for Metal Coil Surface Coating.

45CSR21: This rule does not apply to sources in Brooke county. Precoat Metals is exempt from this rule.

45CSR27: Potential formaldehyde emissions from Precoat Metals is below the applicability threshold of 1,000 lbs/yr.

45CSR29: This rule does not apply because Precoat Metals is located in Brooke County.

40CFR63, Subpart JJJJ: MACT Standards for Paper and other Web Coating. Precoat Metals does not fall under this category.

40CFR Part 68: Risk Management Plan: Precoat Metals does not have regulated materials on-site above the Threshold Planning Quantity.

Permit Shield

**19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.**

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.

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).

Open Burning (45CSR6-3.1, 3.2)

Odor (45CSR4-3.1)

Permanent Shutdown (45CSR13-10.5)

Standby Plan for Reducing Emissions (45CSR11-5.2)

Ozone Depleting Substances (40CFR82, Subpart F)

Operation in Accordance with Plans and Specifications in Permit Applications and Modifications

Maintain Particulate Matter Control (45CSR7-5.2)

40CFR Part 63 Subpart SSSS: NESHAP for Surface Coating of Metal Coils

40CFR Part 60 Subpart TT: NSPS for Metal Coil Surface Coating

New Applicable Requirements (45CSR30-4.3.h.1.B)

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.)**

Stack Testing: The permittee shall conduct stack tests to determine compliance with emissions limitations in accordance with an approved test protocol. Protocol must be submitted to the secretary in writing at least 30 days prior to any testing. Secretary shall be notified 15 days prior to testing. Testing shall occur once during each permit term.

45CSR30-5.1.c.: If sources of visible emissions are identified, conduct an evaluation per 45CSR7A-2.1.,b within 24 hours unless the visible emission condition is corrected in a timely manner and the units are operated at normal conditions.

45CSR5.1.c.2.A., Monitoring information shall include items specified in the Title V operating permit.

45CSR30-5.1.c.2.B, : Retain records of all information required by the permit in form suitable and readily available for expeditious inspection and review for a period of at least five years from the date of each occurrence. Maintain at least the current two years on site.

45CSR30-5.1c. : Odor – Maintain records of all odor complaints and any investigation or response in response to complaints.

45CSR30-5.1c. : A responsible official shall certify any documents required by this permit that are submitted to DAQ and/or USEPA that, “Based on information and belief formed after reasonable inquiry, the statements and the information in the document are true, accurate, and complete.

45CSR30-8: Permittee shall submit a certified emissions statement and pay fees on an annual basis A receipt for the appropriate shall be maintained on site.

45CSR30-5.3.e.: Permittee shall submit annual compliance certification prior to March 15 for the record period ending the prior December 31.

45CSR30-5.1.c.3.A.: Semi Annuaql monitoring reports shall be submitted on September 15 for the period 1/1 to 6/30 and on March 15 for the period 7/1 to 12/31.

40CFR63.5130(a): Comply with all applicable requirements of 40 CFR 63, Subpart SSSS.

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

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

**20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.**

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

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.)

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**

<b>23. Facility-Wide Emissions Summary [Tons per Year]</b>	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	62.9
Nitrogen Oxides (NO <sub>x</sub> )	70.3
Lead (Pb)	0
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	5.35
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	5.35
Total Particulate Matter (TSP)	5.35
Sulfur Dioxide (SO <sub>2</sub> )	2.09
Volatile Organic Compounds (VOC)	1000
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
Chromium Compounds	0.07
Hydrogen Chloride	0.17
Hydrogen Flouride	0.50
Formaldehyde	0.97
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Phosphoric Acid	0.25
Nitric Acid	0.71

<sup>1</sup>PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.  
<sup>2</sup>For 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**

<b>24. Insignificant Activities (Check all that apply)</b>	
<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 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 <sub>2</sub> 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 checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input 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 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 <sub>x</sub> , SO <sub>2</sub> , 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:  _____ _____ _____ _____ _____ _____ _____ _____ _____

<b>24. Insignificant Activities (Check all that apply)</b>	
<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 checked="" 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 checked="" 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 type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" 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 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 checked="" 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 checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

<b>24. Insignificant Activities (Check all that apply)</b>	
<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 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 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 checked="" 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 checked="" 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 type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

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

<b>25. Equipment Table</b>
Fill out the <b>Title V Equipment Table</b> and provide it as <b>ATTACHMENT D</b> .
<b>26. Emission Units</b>
For each emission unit listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Emission Unit Form</b> as <b>ATTACHMENT E</b> .
For each emission unit not in compliance with an applicable requirement, fill out a <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .
<b>27. Control Devices</b>
For each control device listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Air Pollution Control Device Form</b> as <b>ATTACHMENT G</b> .
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 <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as <b>ATTACHMENT H</b> .

**Attachment R**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**AUTHORITY OF CORPORATION OR OTHER BUSINESS ENTITY**

**AUTHORIZATION FORM**

**Attachment R  
AUTHORITY OF CORPORATION  
OR OTHER BUSINESS ENTITY (DOMESTIC OR FOREIGN)**

TO: The West Virginia Department of Environmental Protection,  
Division of Air Quality

DATE: September 22, 2017 , \_\_\_\_\_

ATTN.: Director

Corporation's / other business entity's Federal Employer I.D. Number 35-0901870

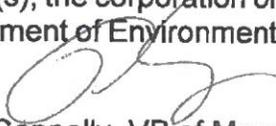
The undersigned hereby files with the West Virginia Department of Environmental Protection, Division of Air Quality, a permit application and hereby certifies that the said name is a trade name which is used in the conduct of an incorporated business or other business entity.

Further, the corporation or the business entity certifies as follows:

(1) Scott Hollo, Plant Manager (is/are) the authorized representative(s) and in that capacity may represent the interest of the corporation or the business entity and may obligate and legally bind the corporation or the business entity.

(2) The corporation or the business entity is authorized to do business in the State of West Virginia.

(3) If the corporation or the business entity changes its authorized representative(s), the corporation or the business entity shall notify the Director of the West Virginia Department of Environmental Protection, Division of Air Quality, immediately upon such change.

  
Patrick Connelly, VP of Manufacturing

\_\_\_\_\_  
President or Other Authorized Officer  
(Vice President, Secretary, Treasurer or other  
official in charge of a principal business function of  
the corporation or the business entity)

(If not the President, then the corporation or the business entity must submit certified minutes or bylaws stating legal authority of other authorized officer to bind the corporation or the business entity).

\_\_\_\_\_  
Secretary

PRECOAT METALS  
\_\_\_\_\_  
Name of Corporation or business entity

**Section 6: Certification of Information**

<b>28. Certification of Truth, Accuracy and Completeness and Certification of Compliance</b>	
<i>Note: This Certification must be signed by a responsible official. The <b>original</b>, signed in <b>blue ink</b>, must be submitted with the application. Applications without an <b>original</b> signed certification will be considered as incomplete.</i>	
<b>a. Certification of Truth, Accuracy and Completeness</b>	
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>b. Compliance Certification</b>	
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.	
<b>Responsible official (type or print)</b>	
Name: Scott Hollo	Title: Plant Manager
<b>Responsible official's signature:</b>	
Signature: 	Signature Date: <u>11/17/17</u>
(Must be signed and dated in blue ink)	

<b>Note: Please check all applicable attachments included with this permit application:</b>	
<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)
<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.wv.gov/dag](http://www.dep.wv.gov/dag), requested by phone (304) 926-0475, and/or obtained through the mail.**

**Attachment A**

**Title V Permit Renewal**

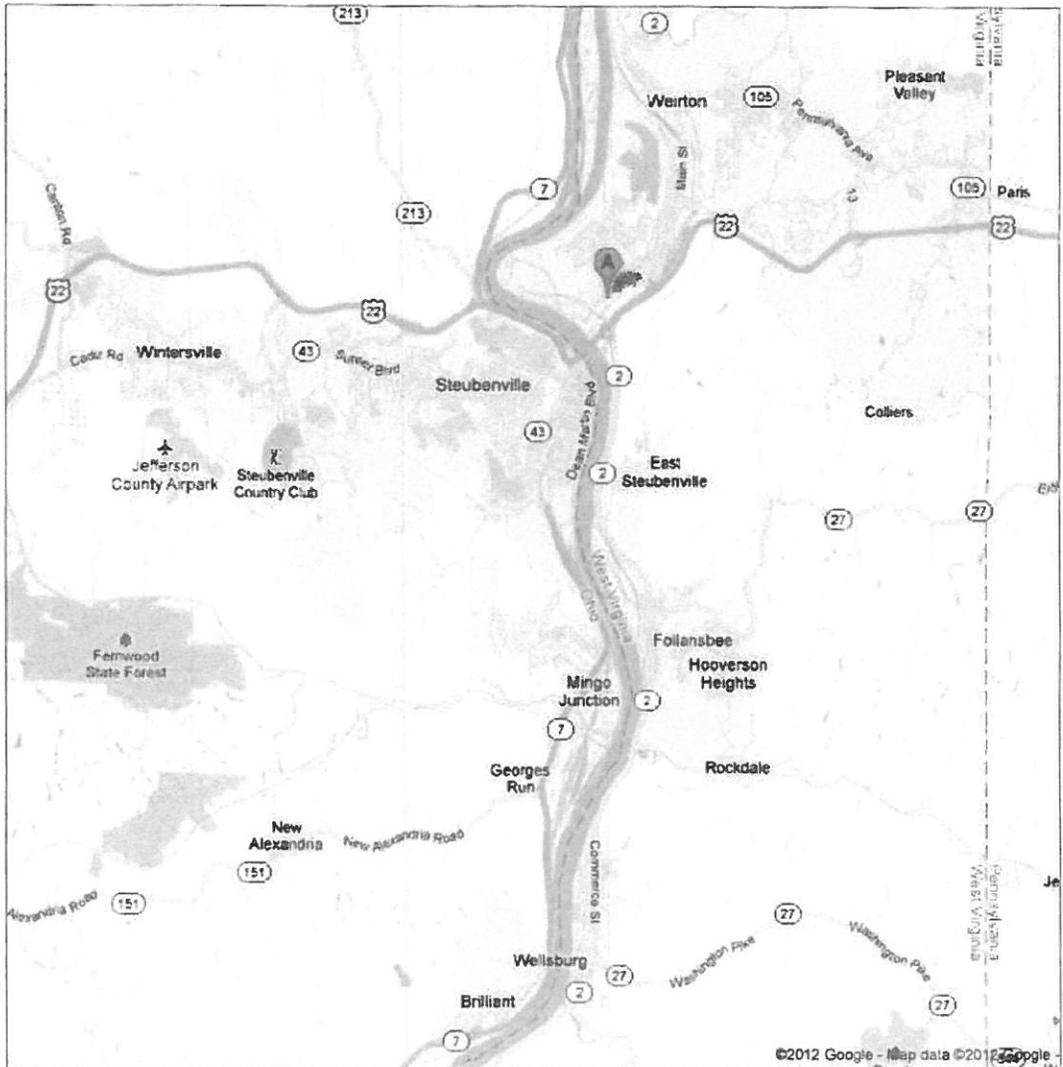
**Permit NO: R30-00900054-2013**

**AREA MAP**



Address **4502 Freedom Way**  
**Weirton, WV 26062**

Get Google Maps on your phone  
Text the word "GMAPS" to 466453



**Attachment B**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

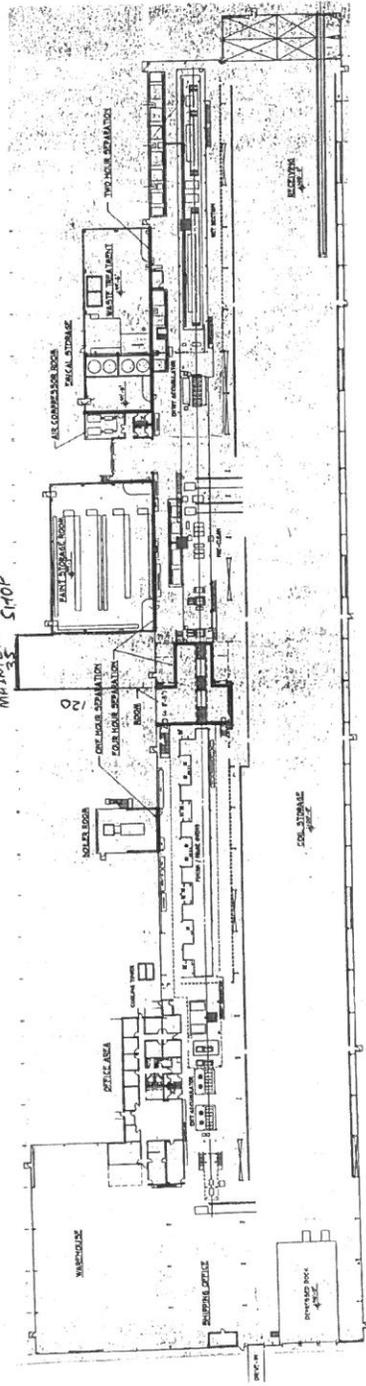
**PLOT PLAN**

Total Square Footage 176,600

Approximate Usable Warehouse space  
64,000 sq. ft  
does not include rackings

$120 \times 35 = 4200$

MAINTENANCE SHOP



AREA CALCULATION AND FIRE RESISTANCE PLAN

ITEM	DESCRIPTION	AREA (SQ. FT.)	PERCENTAGE
1	WAREHOUSE	64,000	36.2
2	OFFICE AREA	10,000	5.7
3	MAINTENANCE SHOP	4,200	2.4
4	OTHER	98,400	55.7
<b>TOTAL</b>		<b>176,600</b>	<b>100.0</b>



KEY PLAN

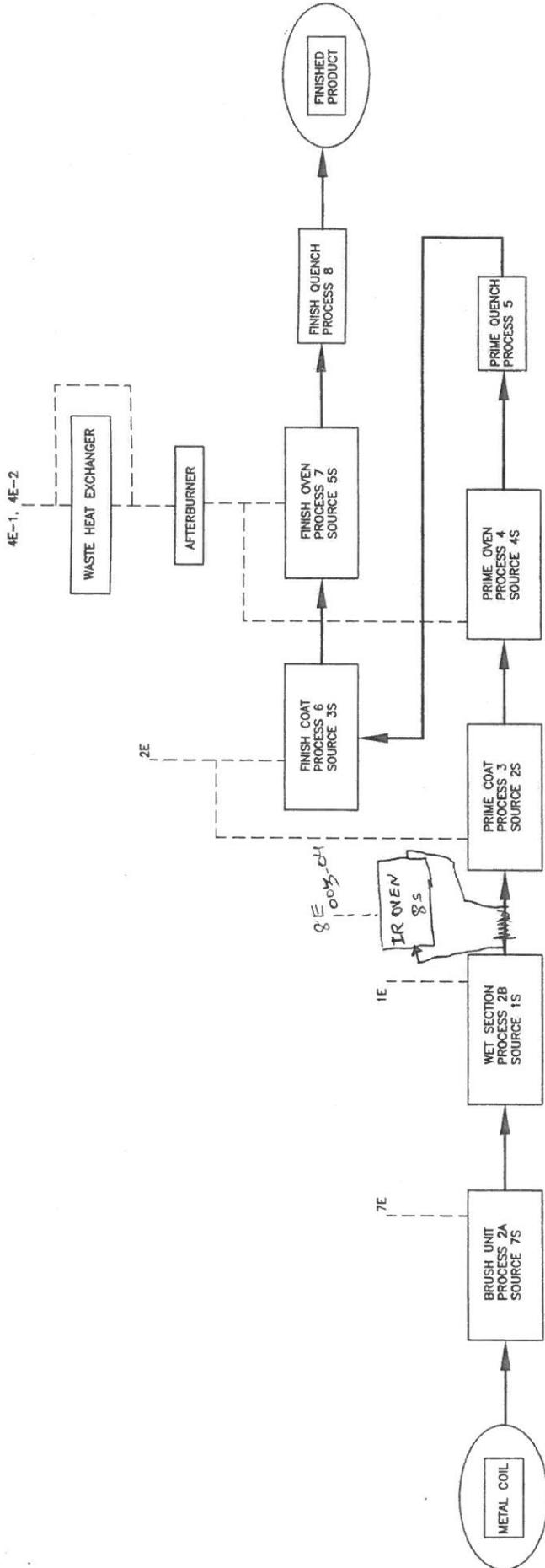
NO.	DESCRIPTION	DATE	BY
1	PRELIMINARY	10/1/88	J.M.
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3	REVISED	11/1/88	J.M.
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**Attachment C**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**PROCESS FLOW DIAGRAM**



WATER TREATMENT SOURCE 6S



**Civil & Environmental Consultants, Inc.**

333 Baldwin Road, Pittsburgh, PA 15205-6702  
 (412) 251-2224 • (800) 485-2924

FLOW DIAGRAM  
 ROLL COATER, INC.  
 WEIRTON, WEST VIRGINIA

PROJECT NO: 070-550  
 DRAWN BY: SPS  
 CHECKED BY: KAM  
 DWG SCALE: N.T.S.  
 LAST EDIT DATE: 11/28/07  
 FIGURE NO: 1

**Attachment D**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**EMISSIONS UNIT TABLE**

**ATTACHMENT D - Title V Equipment Table**  
**(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)**

Emission Point ID <sup>1</sup>	Control Device <sup>1</sup>	Emission Unit ID <sup>1</sup>	Emission Unit Description	Design Capacity	Year Installed/Modified
001-01	None	1s (1e)	Wet Section Process	79.1 tons/hr (158,232 lb/hr) Metal coil	1996
002-01	None	2s (2e)	Prime Coating	180 gal/hr solvent and 79.1 tons/hr metal coil	1996
002-02	None	3s (3e)	Finish Coating	180 gal/hr solvent and 80.1 tons/hr coated metal coil	1996
003-03 003-09	None	4s (4e- 1&2)	Prime Oven	180 gal/hr solvent and 80.1 tons/hr coated metal coil	1996
003-03 003-09	None	4s (4e- 1&2)	Finish Oven	180 gal/hr solvent and 80.1 tons/hr coated metal coil	1996
003-03	None	4e-1	Afterburner	41 MMBtu/hr	1996
003-09	None	4e-2	Waste Heat Boiler	41 MMBtu/hr	1996
004-01	None	6s (6e)	Wastewater Treatment	40 gpm 57,600 gpd	1996
005-01	None	7s (7e)	Brush Unit	3,300 ft <sup>2</sup> /min/side 79.1 tons/hr metal coil	1996
003-04	None	8s (8e)	Natural Gas-Fired Infrared Drying Oven	4.46 MMBtu/hr	2013

<sup>1</sup>For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

**Attachment E**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**EMISSIONS UNIT FORMS**

## ATTACHMENT E - Emission Unit Form

### *Emission Unit Description*

<b>Emission unit ID number:</b> 1s	<b>Emission unit name:</b> Wet Section Process	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
This is a 6-stage chemical treatment process where metal coil is cleaned, treated, and rinsed using mineral acids, water and other materials. Each treatment unit is ducted to a ventilation fan that discharges to the atmosphere.

<b>Manufacturer:</b> Custom	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
79.1 Tons of Metal Coil Processed per hour

<b>Maximum Hourly Throughput:</b> 79.1 Tons of Metal Coil	<b>Maximum Annual Throughput:</b> 693,000 Tons of Metal Coil	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr
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### *Fuel Usage Data (fill out all applicable fields)*

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

NA

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

<b>Emissions Data</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0	0
Particulate Matter (PM <sub>10</sub> )	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	0	0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Chromium Compounds	0.016	0.070
Hydrogen Chloride	0.039	0.171
Hydrogen Fluoride	0.114	0.5
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Phosphoric Acid	0.057	0.25
Nitric Acid	0.163	0.71
<p><b>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.).</b></p> <p>Based on the Permit Limits and an assumed 8,760 hrs/yr operation.</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.

1. Permit Condition 4.1.1: Emission Limits: Chromium (0.016 lb/hr and 0.07 tpy), Hydrogen Chloride (0.039 lb/hr and 0.00084 tpy), Hydrogen Fluoride (0.114 lb/hr and 0.50 tpy), Nitric Acid (0.163 lb/hr and 0.71tpy), Phosphoric Acid (0.057 lb/hr and 0.25 tpy).
2. 45CSR7-3.1, Permit Condition 4.1.2: Opacity limit of 20% except noted per 45CSR7.
3. 45CSR7-3.2, Permit Condition 4.1.3: Opacity < 40% is permitted for up to 5 minutes during any 60-minute period.
4. Permit Condition 4.1.4: Mineral Acid shall not be released in excess of quantities in Table 45-7B of 45CSR7. Compliance shall be demonstrated through compliance with the hourly mineral acid limits of Section 4.1.1.
5. Permit Condition 4.1.5: Circumvention of 45CSR7 through addition of gas to exhaust for purpose of reducing gas concentration is prohibited.

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.)

1. Weekly visual emissions checks of each emission point subject to an opacity limit. Checks will be conducted during period of normal operation following 40CFR60, Appendix A, Method 22.
2. Compliance with emission limits shall be demonstrated by using the test results from the most recent compliance testing per test methods specified in Condition 4.3.1.
3. Maintain records of visual emissions check for no less than 5 years.

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**

<b>Emission unit ID number:</b> 2s	<b>Emission unit name:</b> Prime Coating	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Prime coating process consist of a shuttle-type coater with two application heads for the top of the metal strip and a shuttle-type coater with two application heads for the bottom of the metal strip. Primer is pumped from 55-gallon drums into a paint pan where it is picked up by a pickup roller, metered, and transferred to the metal strip. The process is enclosed in a room. VOCs from the metal strip come off in the metal drying ovens which is collected and sent to the afterburner for destruction.

<b>Manufacturer:</b> CFG	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 79.1 Tons of Bare Metal Coil per hour and 180 gallons of solvent load per hour.

<b>Maximum Hourly Throughput:</b> 79.1 Tons of Metal Coil and 180 gal/hr solvent	<b>Maximum Annual Throughput:</b> 693,000 Tons of Metal Coil 1.577 MMGal Solvent	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> ___ Yes <u> X </u> No	<b>If yes, is it?</b> ___ Indirect Fired ___ Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> NA	<b>Type and Btu/hr rating of burners:</b> NA
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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.**

NA

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

<b>Emissions Data</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0	0
Particulate Matter (PM <sub>10</sub> )	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	10	43.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.02	0.09
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation.

*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.

1. Permit Condition 5.1.1: Formaldehyde emission limits of 0.04 lb/hr and 0.18 tpy and total VOC emission limits of 20.0 lb/hr and 87.6 tpy.
2. Permit Condition 5.1.3: Coating information with required content from the manufacturer can be used instead of an MSDS.
3. 40CFR60.462(4), Subpart TT: A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

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.)

1. MSDS shall be maintained on site and available for inspection.
2. Stack testing shall be performed to determine VOC emissions from emission point 2E using Methods 1, 2, 3, 4, 24 and 25 of 40 CFR 60, Appendix A.
3. Records of coatings and solvent usage and emissions shall be maintained on site along with the hours of operations.
4. A responsible official will certify and submit records to the director after the end of each quarter.
5. Submit results of stack tests to the director within 60 days from the date testing is completed.

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**

<b>Emission unit ID number:</b> 3s	<b>Emission unit name:</b> Finish Coating	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
 Finish coating process consist of two independent coater heads with applicator, pickup, and metering rolls for the top of the strip and a shuttle-type coater with two application heads for the bottom of the metal strip. Finish paint is pumped from 55-gallon drums into a paint pan where it is picked up by a pickup roller, metered, and transferred to the metal strip. The process is enclosed in a room. VOCs from the metal strip come off in the metal drying ovens which is collected and sent to the afterburner for destruction.

<b>Manufacturer:</b> CFG	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
 80.1 Tons of Bare Metal Coil per hour and 180 gallons of solvent load per hour.

<b>Maximum Hourly Throughput:</b> 80.1 Tons of Metal Coil and 180 gal/hr solvent	<b>Maximum Annual Throughput:</b> 702,000 Tons of Metal Coil 1.577 MMGal Solvent	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> ___Yes <u>X</u> No	<b>If yes, is it?</b> ___ Indirect Fired ___ Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> NA	<b>Type and Btu/hr rating of burners:</b> NA
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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.**

NA

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0	0
Particulate Matter (PM <sub>10</sub> )	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	10	43.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.02	0.09
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation.

**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.

1. Permit Condition 5.1.1: Formaldehyde emission limits of 0.04 lb/hr and 0.18 tpy and total VOC emission limits of 20.0 lb/hr and 87.6 tpy.
2. Permit Condition 5.1.3: Coating information with required content from the manufacturer can be used instead of an MSDS.
3. 40CFR60.462(4), Subpart TT: A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

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.)

1. MSDS shall be maintained on site and available for inspection.
2. Stack testing shall be performed to determine VOC emissions from emission point 2E using Methods 1, 2, 3, 4, 24 and 25 of 40 CFR 60, Appendix A.
3. Records of coatings and solvent usage and emissions shall be maintained on site along with the hours of operations.
4. A responsible official will certify and submit records to the director after the end of each quarter.
5. Submit results of stack tests to the director within 60 days from the date testing is completed.

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

<b>Emission Unit Description</b>			
<b>Emission unit ID number:</b> 4s	<b>Emission unit name:</b> Prime Oven	<b>List any control devices associated with this emission unit:</b> Afterburner (4e-1)	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b>  The prime oven cures and dries the surface coat on the metal strip through a combination of radiant and convection heat. This is an insulated enclosure with ducts connecting the coater room and the entry and the quench at the exit. VOCs present in the enclosure are exhausted, mixed with the finish oven exhaust, and ducted to the afterburner for destruction.			
<b>Manufacturer:</b> Proenco Systems	<b>Model number:</b> None	<b>Serial number:</b> None	
<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> 80 Tons of Coated Metal Coil per hour and 180 gallons of solvent load per hour.			
<b>Maximum Hourly Throughput:</b> 80 Tons of Coated Metal Coil and 180 gal/hr solvent.	<b>Maximum Annual Throughput:</b> 702,000 Tons of Metal Coil 1,577 MMGal Solvent.	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr.	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>If yes, is it?</b>  <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b> 41 MMBtu/hr.		<b>Type and Btu/hr rating of burners:</b> MAXON Model 400 OVENPAK burners: 2 @ 6 MMBtu/hr and 4 @ 5 MMBtu/hr, plus one 9 MMBtu/hr pre-heater burner.	
<b>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.</b>  Natural Gas (LHV 950 Btu/scf) ~ 43,200 scf/hr and 378 MMscf/yr.			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	2,000 grains/MMscf	NIL	950 – 1050/scf

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7	30.65
Nitrogen Oxides (NO <sub>x</sub> )	7.8	34.15
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0.47	2.05
Particulate Matter (PM <sub>10</sub> )	0.47	2.05
Total Particulate Matter (TSP)	0.47	2.05
Sulfur Dioxide (SO <sub>2</sub> )	0.138	0.6
Volatile Organic Compounds (VOC)	16.2	70.95
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.03	0.13
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation. PM<sub>2.5</sub> assumed to be equal to PM<sub>10</sub> and TSP for natural gas combustion. Assumes 98.5% minimum afterburner control efficiency.

**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.**

1. Permit Condition 6.1.1: Emission limits for the combined prime and finish ovens (4E) are: Carbon Monoxide (14.0 lb/hr and 61.3 tpy), Formaldehyde (0.06 lb/hr and 0.26 tpy), Nitrogen Oxides (15.6 lb/hr and 68.3 tpy), Particulate Matter (0.94 lb/hr and 4.1 tpy), Sulfur Dioxide (0.275 lb/hr and 1.2 tpy), Total VOC (32.4 lb/hr and 141.9 tpy).
2. Permit Condition 6.1.3: The afterburner used to control emissions from the prime and finish ovens shall be at least 98.5% efficient in destroying VOCs.
3. 45CSR7-3.1, Condition 6.1.5: Opacity Limit of 20% except per 6.1.6.
4. 45CSR7-3.2, Condition 6.1.6: Opacity < 40% is permitted for up to 5 minutes during any 60-minute period.
5. 45CSR7-4.1, Condition 6.1.8: Particulate Matter emission may not exceed limits set for the appropriate source type in Table 45-71 of 45CSR7. Compliance with 45CSR7-4.1 hourly limits for this emission group shall be demonstrated through compliance with the hourly limits set in Condition 6.1.1.
6. 45CSR7-4.2, Condition 6.1.7: Circumvention of 45CSR7 through addition of gas to the exhaust for purpose of reducing gas concentrations is prohibited.
7. 45CSR7-4.2, Condition 6.1.9: Fugitive particulate emissions shall be limited through a system installed, maintained, and operated to ensure the lowest emissions reasonable achievable.
8. 45CSR7-10.3, Condition 6.1.10: Maintenance operations shall be exempt from Section 4 of 45CSR7 provided such operations are conducted in a manner consistent with good pollution control practices.
9. 45CSR10-4.1, Condition 6.1.12: Emissions from any source operation shall not exceed an in-stack sulfur dioxide concentration of 2,000 ppmv.
10. 45CSR13, Condition 6.1.13: To the extent practicable, install, maintain, and operate all pollution control equipment (i.e., afterburner) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions or comply with any more stringent applicable limits.

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.)**

1. Permit Condition 6.2.1 Weekly visual emissions checks of each emission point subject to an opacity limit. Checks will be conducted during period of normal operation following 40CFR60, Appendix A, Method 22.
2. 40CFR 60.464(c) and 60.465, Subpart TT and Permit Condition 6.2.2: Install, calibrate, operate and maintain a device for continuous recording of temperature of any effluent gases incinerated to achieve 98.5% efficiency. Specific accuracy requirements apply per this condition. All periods in excess of 3 hours during which the average temperature in the afterburner remains more than 28°C (50°F) below the temperature at which compliance was demonstrated during the most recent measurement shall be recorded and reported every quarter (or semiannually when no such event occur in a quarter).
3. Permit Condition 6.2.3: Upon demonstration of compliance with NOx and CO limits per testing requirements, continual compliance shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and the afterburner.
4. Permit Condition 6.2.4: Continual compliance with particulate matter and sulfur dioxide limits shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and the afterburner.
5. Permit Condition 6.3.2: Stack testing shall be performed to determine VOC emissions from emission point 2E using Methods 1, 2, 3, 4, 24 and 25 of 40 CFR 60, Appendix A.
6. Permit Condition 6.4.1: Maintain records of formaldehyde emissions and calculate emissions using a maximum percentage by weight of 0.075. Update emissions estimate monthly.
7. Permit Condition 6.4.2: Demonstrate compliance with the SO2 limits maintaining records of the hours of operations and the quantity of fuel combusted each month in the prime oven, finish oven, and the afterburner.
8. 40CFR60.464(a), Subpart TT and Permit Condition 6.4.3: Compute and record the average VOC content of coatings applied during each calendar month.
9. Permit Condition 6.2.1 and 6.4.4: Maintain records of the visual emission check required in Section 6.2.1 for a period of no less than 5 years.
10. Permit Condition 6.4.5: Maintain accurate records of all required pollution control equipment inspections and/or preventative maintenance procedures for the afterburner.
11. Permit Condition 6.4.6: For all air pollution control equipment (Afterburner), maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur.
12. 40CFR60.48(c), Subpart TT and Permit Condition 6.5.1: Reports required by Section 6.4.3 shall be submitted semiannually by the 30<sup>th</sup> day following the end of the reporting period.
13. 40CFR60.465, Subpart TT and Permit Condition 6.5.2: Each report required at the permit renewal will include the weighted average of the VOC content of coatings used during a period of one calendar month, the overall VOC destruction rate used to attain compliance with 40CFR60.462(a)(2), Subpart TT, and the the combustion temperature of the thermal incinerator used to attain compliance with 40CFR60.462(a)(2), Subpart TT.

**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*

<b>Emission unit ID number:</b> 5s	<b>Emission unit name:</b> Finish Oven	<b>List any control devices associated with this emission unit:</b> Afterburner (4e-1)
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

The finish oven cures and dries the surface coat on the metal strip through a combination of radiant and convection heat. This is an insulated enclosure with ducts connecting the coater room and the entry and the quench at the exit. VOCs present in the enclosure are exhausted, mixed with the finish oven exhaust, and ducted to the afterburner for destruction.

<b>Manufacturer:</b> Proenco Systems	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
80 Tons of Coated Metal Coil per hour and 180 gallons of solvent load per hour.

<b>Maximum Hourly Throughput:</b> 80 Tons of Coated Metal Coil and 180 gal/hr solvent.	<b>Maximum Annual Throughput:</b> 702,000 Tons of Metal Coil 1.577 MMGal Solvent.	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr.
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> 41 MMBtu/hr.	<b>Type and Btu/hr rating of burners:</b> MAXON Model 400 OVENPAK burners: 2 @ 6 MMBtu/hr and 4 @ 5 MMBtu/hr, plus one 9 MMBtu/hr pre-heater burner.
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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.**

Natural Gas (LHV 950 Btu/scf) ~ 43,200 scf/hr and 378 MMscf/yr.

**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	2,000 grains/MMscf	NIL	950 – 1050/scf

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7	30.65
Nitrogen Oxides (NO <sub>x</sub> )	7.8	34.15
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0.47	2.05
Particulate Matter (PM <sub>10</sub> )	0.47	2.05
Total Particulate Matter (TSP)	0.47	2.05
Sulfur Dioxide (SO <sub>2</sub> )	0.138	0.6
Volatile Organic Compounds (VOC)	16.2	70.95
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.03	0.13
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation. PM2.5 assumed to be equal to PM10 and TSP for natural gas combustion. Assumes 98.5% minimum afterburner control efficiency.

**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.

1. Permit Condition 6.1.1: Emission limits for the combined prime and finish ovens (4E) are: Carbon Monoxide (14.0 lb/hr and 61.3 tpy), Formaldehyde (0.06 lb/hr and 0.26 tpy), Nitrogen Oxides (15.6 lb/hr and 68.3 tpy), Particulate Matter (0.94 lb/hr and 4.1 tpy), Sulfur Dioxide (0.275 lb/hr and 1.2 tpy), Total VOC (32.4 lb/hr and 141.9 tpy).
2. Permit Condition 6.1.3: The afterburner used to control emissions from the prime and finish ovens shall be at least 98.5% efficient in destroying VOCs.
3. Permit Condition 6.1.5: Opacity Limit of 20% except per 6.1.6.
4. Permit Condition 6.1.6: Opacity < 40% is permitted for up to 5 minutes during any 60-minute period.
5. Permit Condition 6.1.8: Particulate Matter emission may not exceed limits set for the appropriate source type in Table 45-71 of 45CSR7. Compliance with 45CSR7-4.1 hourly limits for this emission group shall be demonstrated through compliance with the hourly limits set in Condition 6.1.1.
6. Permit Condition 6.1.7: Circumvention of 45CSR7 through addition of gas to the exhaust for purpose of reducing gas concentrations is prohibited.
7. Permit Condition 6.1.9: Fugitive particulate emissions shall be limited through a system installed, maintained, and operated to ensure the lowest emissions reasonable achievable.
8. Permit Condition 6.1.10: Maintenance operations shall be exempt from Section 4 of 45CSR7 provided such operations are conducted in a manner consistent with good pollution control practices.
9. Permit Condition 6.1.12: Emissions from any source operation shall not exceed an in-stack sulfur dioxide concentration of 2,000 ppmv.
10. Permit Condition 6.1.13: To the extent practicable, install, maintain, and operate all pollution control equipment (i.e., afterburner) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions or comply with any more stringent applicable limits.

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.)**

1. Permit Condition 6.2.1 Weekly visual emissions checks of each emission point subject to an opacity limit. Checks will be conducted during period of normal operation following 40CFR60, Appendix A, Method 22.
2. 40CFR 60.464(c) and 60.465, Subpart TT and Permit Condition 6.2.2: Install, calibrate, operate and maintain a device for continuous recording of temperature of any effluent gases incinerated to achieve 98.5% efficiency. Specific accuracy requirements apply per this condition. All periods in excess of 3 hours during which the average temperature in the afterburner remains more than 28°C (50°F) below the temperature at which compliance was demonstrated during the most recent measurement shall be recorded and reported every quarter (or semiannually when no such event occur in a quarter).
3. Permit Condition 6.2.3: Upon demonstration of compliance with NOx and CO limits per testing requirements, continual compliance shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and the afterburner.
4. Permit Condition 6.2.4: Continual compliance with particulate matter and sulfur dioxide limits shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and the afterburner.
5. Permit Condition 6.3.2: Stack testing shall be performed to determine VOC emissions from emission point 2E using Methods 1, 2, 3, 4, 24 and 25 of 40 CFR 60, Appendix A.
6. Permit Condition 6.4.1: Maintain records of formaldehyde emissions and calculate emissions using a maximum percentage by weight of 0.075. Update emissions estimate monthly.
7. Permit Condition 6.4.2: Demonstrate compliance with the SO2 limits maintaining records of the hours of operations and the quantity of fuel combusted each month in the prime oven, finish oven, and the afterburner.
8. 40CFR60.464(a), Subpart TT and Permit Condition 6.4.3: Compute and record the average VOC content of coatings applied during each calendar month.
9. Permit Condition 6.2.1 and 6.4.4: Maintain records of the visual emission check required in Section 6.2.1 for a period of no less than 5 years.
10. Permit Condition 6.4.5: Maintain accurate records of all required pollution control equipment inspections and/or preventative maintenance procedures for the afterburner.
11. Permit Condition 6.4.6: For all air pollution control equipment (Afterburner), maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur.
12. 40CFR60.48(c), Subpart TT and 45CSR13, Permit Condition 6.5.1: Reports required by Section 6.4.3 shall be submitted semiannually by the 30<sup>th</sup> day following the end of the reporting period.
13. 40CFR60.465, Subpart TT and 45CSR13, Permit Condition 6.5.2: Each report required at the permit renewal will include the weighted average of the VOC content of coatings used during a period of one calendar month, the overall VOC destruction rate used to attain compliance with 40CFR60.462(a)(2), Subpart TT, and the the combustion temperature of the thermal incinerator used to attain compliance with 40CFR60.462(a)(2), Subpart TT.

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**

<b>Emission unit ID number:</b> 6s	<b>Emission unit name:</b> Wastewater Treatment	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

As part of chrome waste water treatment process, hexavalent chromium is converted to trivalent chromium for precipitation and removal from the wastewater. The process is conducted at low pH which generates sulfurous acid. Some of the sulfurous acid decomposes to sulfur dioxide and water. Sulfur dioxide is vented to the atmosphere through source 6e.

<b>Manufacturer:</b> DMP Corporation	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
40 gallons per minute of wastewtaer.

<b>Maximum Hourly Throughput:</b> 2,400 gallons.	<b>Maximum Annual Throughput:</b> 21 Million Gallons.	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr.
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**Fuel Usage Data (fill out all applicable fields)**

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

NA

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0	0
Particulate Matter (PM <sub>10</sub> )	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO <sub>2</sub> )	0.2	0.88
Volatile Organic Compounds (VOC)	0	0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation.

**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.

1. Permit Condition 7.1.1: Sulfur dioxide emission limits of 0.20 lb/hr and 0.88 tpy.
2. Permit Condition 7.1.2: Emissions from any source operation shall not exceed an in-stack sulfur dioxide concentration of 2,000 ppmv.

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.)

1. Permit Condition 7.2.1: The wastewater treatment process shall be operated by providing adequate mixing of the wastewater and chemicals, maintaining proper pH levels and allowing sufficient reaction time.
2. Permit Condition 7.3.1: Keep monthly engineering estimates along with the supporting documentation, of the amount of sulfur dioxide emitted.

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**

<b>Emission unit ID number:</b> 7s	<b>Emission unit name:</b> Brush Unit	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

Particulate emissions are generated by brushing steel strip with 6 aluminum oxide brushes rotating at 900 rpm. Brushes are flushed with water to wash away dirt. The system is enclosed and ducted to a ventilation fan.

<b>Manufacturer:</b> Proenco Systems	<b>Model number:</b> None	<b>Serial number:</b> None
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<b>Construction date:</b> Spring 1996	<b>Installation date:</b> 08/01 /1996	<b>Modification date(s):</b> NA
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**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**

79.1 Tons Metal Coil Processed per hour.  
3,300 Square Feet per minute per side.

<b>Maximum Hourly Throughput:</b> 79.1 Tons of Metal Coil Processed per hour. 3,300 Square feet per minute per side.	<b>Maximum Annual Throughput:</b> 702,000 Tons of Metal Coil 1.73 Billion Sqft/side.	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr.
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> ___Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b>  ___ Indirect Fired    ___ Direct Fired
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<b>Maximum design heat input and/or maximum horsepower rating:</b> NA	<b>Type and Btu/hr rating of burners:</b> NA
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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.**

NA

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

**Emissions Data**

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0.25	1.1
Particulate Matter (PM <sub>10</sub> )	0.25	1.1
Total Particulate Matter (TSP)	0.25	1.1
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	0	0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).**

Based on the Permit Limits and an assumed 8,760 hrs/yr operation. PM2.5 assumed to be equal to PM10 and TSP.

**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.

1. Permit Condition 8.1.1: PM Emission limits of 0.25 lb/hr and 1.1 tpy.
2. Permit Condition 8.1.2: Opacity limit of 20% except per 8.1.3.
3. Permit Condition 8.1.3: Opacity < 40% is permitted for up to 5 minutes during any 60-minute period.
4. Permit Condition 8.1.4: Circumvention of 45CSR7 through addition of gas to exhaust for the purpose of reducing gas concentration is prohibited.

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.)

1. Weekly visual emission checks of each emission point subject to an opacity limit. Checks will be conducted during periods of normal operation using procedures per 40CFR60, Appendix A, Method 22.
2. Monthly visual inspections for excess particulate matter on the roof in the area of the stack.
3. Maintain records of visual emission checks for no less than 5 years.

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*

<b>Emission unit ID number:</b> 8s	<b>Emission unit name:</b> Natural Gas-Fired Infrared Drying Oven	<b>List any control devices associated with this emission unit:</b> None
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**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**

The Infrared Drying oven cures and dries the surface coat on the metal strip through a combination of radiant and convection heat. This is an insulated enclosure with ducts connecting the coater room and the entry and the quench at the exit. VOCs present in the enclosure are exhausted, mixed with the finish oven exhaust, and ducted to the afterburner for destruction.

<b>Manufacturer:</b> Marsden	<b>Model number:</b> None	<b>Serial number:</b> None
<b>Construction date:</b> Spring 2013	<b>Installation date:</b>	<b>Modification date(s):</b> NA

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

<b>Maximum Hourly Throughput:</b> 4.46 MMBtu/hr	<b>Maximum Annual Throughput:</b> 693,000 Tons of Metal Coil	<b>Maximum Operating Schedule:</b> 24 Hrs/Day, 7 Days/Wk, 52 Wks/yr.
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**Fuel Usage Data (fill out all applicable fields)**

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b> 4.46 MMBtu/hr.	<b>Type and Btu/hr rating of burners:</b>

**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 (LHV 950 Btu/scf) ~ 43,200 scf/hr and 378 MMscf/yr.

**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	2,000 grains/MMscf	NIL	950 – 1050/scf

**Emissions Data**

<b>Criteria Pollutants</b>	<b>Potential Emissions</b>
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	PPH	TPY
Carbon Monoxide (CO)	0.37	1.62
Nitrogen Oxides (NO <sub>x</sub> )	0.45	1.97
Lead (Pb)	0	0
Particulate Matter (PM <sub>2.5</sub> )	0.034	0.15
Particulate Matter (PM <sub>10</sub> )	0.034	0.15
Total Particulate Matter (TSP)	0.034	0.15
Sulfur Dioxide (SO <sub>2</sub> )	0.003	0.01
Volatile Organic Compounds (VOC)	0.024	0.1
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>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.).</b></p> <p>Based on the Permit Limits and an assumed 8,760 hrs/yr operation. PM<sub>2.5</sub> assumed to be equal to PM<sub>10</sub> and TSP for natural gas combustion.</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.

1. Permit Condition 9.1.1: CO Emission limits of 0.37 lb/hr and 1.62 tpy; and NOx Emission limits of 0.45 lb/hr and 1.97 tpy.
2. Permit Condition 9.1.2: The MDHI shall not exceed 4.46 mmBtu/hr and the unit will be fired by natural gas only. The unit shall not be used to dry VOC containing materials.

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.)

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**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**SCHEDULE OF COMPLIANCE FORM**

**ATTACHMENT F - Schedule of Compliance Form**

Complete this section if you indicated noncompliance with any of the applicable requirements identified in the permit application. For each emission unit which is not in compliance, identify the applicable requirement, the reason(s) for noncompliance, a description of how the source will achieve compliance, and a detailed schedule of compliance. If there is a consent order that applies to this requirement, attach a copy to this form.

**1. Applicable Requirement**  
**Precoat is in compliance with its current Title V Permit**

**Unit(s):**

**Applicable Requirement:**

**2. Reason for Noncompliance:**

**3. How will Compliance be Achieved?**

**4. Consent Order Number (if applicable):**

**5. Schedule of Compliance.** Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

**6. Submittal of Progress Reports.**

**Content of Progress Report:**

**Report starting date:** MM/DD/YYYY

**Submittal frequency:**

**Attachment G**

**Title V Permit Renewal**

**Permit NO: R30-00900054-2013**

**AIR POLLUTION CONTROL DEVICE FORMS**

## ATTACHMENT G - Air Pollution Control Device Form

**Control device ID number:**  
4e-1

**List all emission units associated with this control device.**  
4s Prime Oven and 5s Finish Oven

**Manufacturer:**  
Proenco Systems

**Model number:**  
NA

**Installation date:**  
08/01/1996

**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 checked="" type="checkbox"/> Thermal Incinerator       | <input type="checkbox"/> Flare                 | <input type="checkbox"/> Other (describe) _____               |
| <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	97.22	99.9
Formaldehyde	97.22	99.9

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

Combustion Chamber: 35 feet long x 37 sq ft cross section  
Retention Time: 1 sec  
Combustion Chamber Temperature: 1449°F

**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.**

**This emission unit is exempt from CAM rule requirements because the Prime and Finish ovens are subject to the NESHAP For Surface Coating of Metal Coils (40 CFR 63, Subpart SSSS) and the NSPS for Metal Surface Coating (40 CFR 60, Subpart TT).**

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

Compliance with the requirements of the 40 CFR 63 Subpart SSSS: NESHAP for Metal Coil Surface Coating and 40 CFR 60 Subpart TT: NSPS for Metal Coil Surface Coating, is achieved through continuous recording of the afterburner combustion temperature in accordance with Permit Condition 6.2.2.