

Fact Sheet



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

Permit Number: **R30-00900014-2017**
Application Received: **September 23, 2016**
Plant Identification Number: **03-54-009-00014**
Permittee: **Crown Cork & Seal USA, Inc.**
Facility Name: **Weirton Plant**
Mailing Address: **3011 Birch Drive, Weirton, WV 26062**

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 532.19 km Easting • 4470.82 km Northing • Zone 17
Directions: At the intersection of State Route 2 and US 22 go west on Freedom Way to Birch Drive. Turn right onto Half Moon Industrial Park and go to first building on the right.

Facility Description

Crown Cork & Seal USA (SIC Code 3466 and NAICS Code 332119) manufactures decorative sheets for use in the production of metal closures from raw metal that arrives on flatbed trucks in a single, continuous coil. The continuous coil is unloaded by forklifts and moved to the plate shearing area. The Littell Coil Shearing Machine cuts and stacks the metal into individual sheets. The sheets are then moved by forklifts to the plain metal storage area until the desired coating and printing process begins. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of a cutting area, a coating area with seven coater lines, seven ovens, two thermal oxidizers, and three presses.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions ¹
Carbon Monoxide (CO)	14.99 ²	5.43
Nitrogen Oxides (NO _x)	17.65	6.46
Particulate Matter (PM ₁₀)	1.35 ²	0.19
Total Particulate Matter (TSP)	1.35	0.49
Sulfur Dioxide (SO ₂)	0.11	0.04
Volatile Organic Compounds (VOC)	118	11.65

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions ¹
Cumene	9.4	< 0.01
Ethyl benzene	9.4	0.19
Formaldehyde	0.5	Not reported
Isophorone	9.4	0.5
Methyl Isobutyl Ketone (MIBK)	9.4	0.91
Naphthalene	9.4	0.15
Phenol	9.4	0
Toluene	9.4	0.02
Xylene	9.4	1.09
Total	24.4	2.87

¹ Actual emissions are from the State and Local Emissions Inventory System (SLEIS) Total Emissions by Source Summary Report.

² Potential CO and PM₁₀ emissions were calculated from the sum of the limits in Title V conditions 5.1.5. and 5.1.6.

Title V Program Applicability Basis

This facility has the potential to emit 118 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of Volatile Organic Compounds, Crown Cork & Seal USA, Inc. Weirton Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR6 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations Standby plans for emergency episodes. Pre-construction permits for sources. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4 45CSR27	No objectionable odors. To Prevent and Control the Emissions of Toxic Air Pollutants

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

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

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-2067C	August 17, 2011	

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

Determinations and Justifications

The following changes have been made to the current Title V operating permit for this permit renewal:

1. Section 1.1. (Emission Units) – The contents of the row for UV Coating Line C-5 has been deleted since C-5 was not listed in application Attachment D or details provided in an Attachment E. The permittee confirmed in 5/22/2017 technical correspondence that C-5 has been removed from service.

2. Condition 3.4.3. – Requirement 4.4.4. in permit R13-2067C has been added to this condition. The first statement in 4.4.4. to maintain a record of all odor complaints received is already included in the current Title V condition 3.4.3. However, the remainder of requirement 4.4.4. pertaining to 5-year record retention on-site is not in the current operating permit. Therefore, the second sentence in requirement 4.4.4. of R13-2067C has been added to the Title V renewal permit condition 3.4.3. and its citation of authority has been revised accordingly.
3. Condition 3.5.3. – The paragraph has been updated, the USEPA office name revised, and the DAQ C&E e-mail address has been added.
4. Condition 3.5.5. (Compliance Certification) – The paragraph has been updated, and the DAQ and US EPA e-mail addresses have been added.
5. Condition 3.5.6. (Semi-annual monitoring reports) – The last statement of the renewal paragraph and the DAQ e-mail address have been added.
6. Condition 3.7.2. (Permit Shield) – The following changes have been made to the Permit Shield, the content of which is provided below in the Non-Applicability Determinations section of this Fact Sheet.
 - a. Language under 45CSR10 and 45CSR10A has been revised to account for there being more than one thermal oxidizer.
 - b. The rationale for non-applicability of 40 C.F.R. Part 64 has been added to the table even though it was stated in the 2012 operating permit renewal Fact Sheet.
 - c. 40 C.F.R. 63 Subpart HHHHHH has been added to the table even though it was listed in the 2012 operating permit renewal Fact Sheet.
 - d. 40 C.F.R. 63 Subpart JJJJJJ has been added to the table.
7. Section 4.0 (heading) – The emission unit ID C-5 has been deleted in two places.
8. Condition 4.4.1. – The emission unit ID C-5 has been deleted in requirements 4.4.1.a. through f.
9. Condition 4.2.1. – The language “but no less than one (1) minute” has been added in parenthesis to specify the sufficient time interval between VE checks. The citation of “45CSR§30-5.1.c.” has been added to the citation of authority since 4.2.1. in the underlying permit applies to the thermal oxidizers, but this Title V condition applies to the emission units that are controlled by the thermal oxidizers which have their requirements in Section 5.0 of the operating permit.
10. Condition 5.1.9. – The permittee stated in technical correspondence that the most recent performance test data indicated that a combustion chamber temperature of 1,352°F achieved 99.98% destruction efficiency, and requested that this value replace the 1,400°F value established in the NSR permit requirement. The permittee stated that 1,400°F was included to establish a baseline before installation until as-built performance data was available. However, rather than eliminating the 1,400°F value from the NSR permit requirement, the most recent temperature has been added to the condition since the requirement is an “or” statement.

11. Condition 5.2.1. – The requirement of current permit condition 5.2.1. is less stringent than the requirement of underlying NSR permit R13-2067C requirement 4.2.1. that is to be utilized to determine compliance with visible emissions and opacity requirements. Current Title V condition 5.2.1. first appeared in the 2006 Title V renewal, but there is no discussion in the 2006 Fact Sheet, or in any technical correspondence in DAQ files explaining why it was added. The less stringent monitoring in current condition 5.2.1. is unwarranted. For this renewal, the current language in 5.2.1. has been replaced with a requirement to follow the requirements in condition 4.2.1.
12. Condition 5.4.1. – The current permit condition based solely upon 45CSR§30-5.1.c. is essentially a duplicate of the requirements in condition 5.2.2.; therefore, current condition 5.4.1. has been deleted and replaced with a reference to permit condition 5.2.2. that already prescribes recordkeeping.

Non-Applicability Determinations

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

Rule or Regulation	Rationale
45CSR10 (August 31, 2000)	To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides: Since the oxidizers do not have the potential to emit 500 pounds per year of sulfur oxides, they are not subject to 45CSR§10-4 via 45CSR§10-4.1e. The facility does not combust any refinery or process gas streams and it does not operate a coke production facility; therefore, it is not subject to 45CSR§10-5.
45CSR10A (January 25, 2002)	Testing, Monitoring, Recordkeeping and Reporting Requirements Under 45CSR10: since oxidizers are manufacturing process sources with the PTE for SO ₂ less than 500 lbs/yr, the facility is not subject to 45CSR10A via 45CSR§10A-3.1.c.
40 C.F.R. Part 60 Subpart TT (November 1, 1982)	Standards of Performance for Metal Coil Surface Coating defines metal coil surface coating operation as the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter or more that is packaged in a roll or coil. “This facility cuts the metal coils prior to coating, and as such, is not subject to Subpart TT.”
40 C.F.R. Part 63 Subpart KKKK (November 13, 2003)	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans - The Crown Cork & Seal USA’s Weirton Plant is a synthetic minor source for HAPs. This subpart applies only to major HAP sources.
40 C.F.R. Part 64 (October 22, 1997)	Compliance Assurance Monitoring (CAM). The coaters, ovens, and presses are subject to emission limitations for which the permit specifies a continuous compliance determination method in conditions 5.2.2. and 5.4.4.; therefore, they are exempt from the requirements of the CAM per 40 C.F.R. §64.2(b)(1)(vi).
40 CFR 63, Subpart HHHHHH (January 9, 2008)	Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not applicable to Weirton plant. The facility is a synthetic minor source of HAPs (area source), but it does not conduct paint stripping nor use MeCL, and does not use spray application. Coatings are applied by lithographic roll coating. Therefore, this regulation is not applicable in accordance with 40 C.F.R. §63.11170.
40 CFR 63, Subpart JJJJJJ (Sept. 14, 2016)	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The facility is an area source of HAP; however, any boilers and water heaters utilized at the site combust natural gas only. Therefore, the units are neither subject to Subpart JJJJJJ, nor any of its requirements, in accordance with 40 C.F.R. §§63.11195(e) and (f).

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: July 28, 2017
Ending Date: August 28, 2017

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

Denton B. McDerment, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

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

Point of Contact

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

No comments were received from the public.

In an e-mail dated 8/23/2017, Mr. Paul Wentworth at U.S. EPA Region III stated that he has reviewed this permit and has found no reason to object to its issuance.