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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 18, 2017.

Permit Number: R30-00900012-2017
Application Received: May 1, 2018
Plant Identification Number: 03-54-00900012
Permittee: Ardagh Metal Packaging USA Inc.
Facility Name: Weirton Plant
Mailing Address: 3030 Birch Drive, Weirton, WV 26062

Facility Description
Ardagh Metal Packaging USA Inc. (Weirton Plant) manufactures metal packing for the food and pet food industry and has a SIC Code 3411 and a NAICS Code 332431. The Weirton Plant has four (4) coating lines with three thermal oxidation systems with heat recovery. The operating lines (Line Nos. 1 through 4) include the coating operation, drying operation, and the emission control. The equipment is fed uncoated sheets of metal, applies the coating, dries the coating, and restacks the sheets. The only difference with the lines is that Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied in the coating portion of the operation. The facility receives rolls of sheet metal, cuts the sheets, prints and coats the sheets, dries the coatings and then restacks the sheets. The coated sheets are the final product. The site also makes can ends from the sheet metal. 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 four sheet coaters, four ovens, and three incinerators, and an end press area with six end stampers.
This modification is to replace Thermal Oxidizer No.2 (2C) with a new thermal oxidizer. The new unit will maintain the same destruction efficiency but has a higher heat input and natural gas throughput. These changes were approved under R13-2410E.

Emissions Summary
This modification resulted in the following change in emissions:

<table>
<thead>
<tr>
<th></th>
<th>VOC</th>
<th>PM10</th>
<th>CO</th>
<th>NOx</th>
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<tbody>
<tr>
<td>lb/hr</td>
<td>+0.01</td>
<td>+0.01</td>
<td>+0.17</td>
<td>+0.10</td>
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<tr>
<td>tpy</td>
<td>+0.05</td>
<td>+0.07</td>
<td>+0.73</td>
<td>+0.44</td>
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Title V Program Applicability Basis
With the proposed changes associated with this modification, this facility maintains the potential to emit 142.71 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Ardagh Metal Packaging USA Inc. 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR13 Minor New Source Review Permits for Stationary Sources
45CSR30 Operating permit requirement.

State Only: None.

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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
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<tbody>
<tr>
<td>R13-2410E</td>
<td>May 22, 2018</td>
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</table>

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

The following changes were made as part of this minor modification:

1.1. Emission Units

- Changed the control device description, year installed and design capacity of control device 2C to those of the new TANN Corp Recuperative Thermal Oxidizer Model No. TO885.

Section 5.0

- Updated the emission limits in condition 5.1.1 to account for the higher heat input and natural gas throughput of the 2C control device.
- Updated the maximum heat input and natural gas throughput limit to those of the new 2C control device.

Non-Applicability Determinations

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

NA

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV  25304
Phone: 304/926-0499 ext. 1243  •  Fax: 304/926-0478
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.