

Fact Sheet



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 September 27, 2022.

Permit Number: **R30-00900012-2022**
Application Received: **February 14, 2022**
Plant Identification Number: **03-54-009-00012**
Permittee: **Trivium Packaging USA Inc.**
Facility Name: **Weirton Plant**
Mailing Address: **3030 Birch Drive, Weirton, WV 26062**

Permit Action Number: *MM01* Revised: *December 12, 2022*

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 531.834 km Easting • 4,470.823 km Northing • Zone 17
Directions: Located at Half Moon Industrial Park. Take US Route 22 to Half Moon Road and then to Signode Road.

Facility Description

Trivium 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 the result of Consent Order (CO-R30-E-2022-04) requiring the submittal of an administratively and technically complete Rule 13 Permit Application to modify the destruction efficiency of Thermal Oxidizer 3C to that which was achieved during the most recent stack test and to modify the emissions resulting from that destruction efficiency. R13-2410F addressed the above order of compliance and the changes have been incorporated in this Title V minor modification.

Emissions Summary

This modification did not result in any changes to the facility's potential emissions.

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, Trivium 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:	45CSR6	To Prevent And Control Air Pollution From Combustion Of Refuse
	45CSR13	New Source Review Permits for Stationary Sources
	45CSR30	Operating permit requirement.
State Only:	N/A	

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2410F	August 12, 2022	

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 issuance of R13-2410F resulted in numerous changes to the format of the underlying R13 permit along with the changes to the destruction efficiency of thermal oxidizer 3C and its emissions.

1.1 Emission Units

- Removed Emission Points 23E and 28E since they were removed from R13-2410F.
- Updated the Emission Unit Description of Emission Units 31S and 32S to reflect the changes in R13-2410F.

1.2. Active R13, R14, and R19 Permits

- Updated the permits list from R13-2410E to R13-2410F.

3.0 Facility-Wide Requirements

- Updated the US EPA address in condition 3.5.3.

4.0 Coating Operations

- The Coating Operations section now includes the requirements that had previously been included in old section 5.0 Thermal Oxidizers.
- Removed Emission Point IDs 23E, 28E, 8E, 9E, 30E, 31E, and 32E from the Section title. 23E and 28E no longer exist in the permit and 8E, 9E, and 30E are storage tanks that now have their own source specific requirements in Section 5.0. The cleaning operations 32E are now included in Section 6.0.
- Conditions 4.1.1 - 4.1.5 have been updated to reflect changes to the cited R13 conditions.
- The old requirements of 4.1.6 - 4.1.12 were removed since the cited R13-2410 conditions no longer exist with the issuance of R13-2410F.
- Conditions 4.1.6 - 4.1.8 now contain the 45CSR6 requirements for thermal oxidizers that had previously been conditions 5.1.7 - 5.1.9.
- Added conditions 4.2.1 and 4.2.2 to incorporate the new monitoring conditions of R13-2410F.
- Conditions 4.2.3 - 4.2.10 are the CAM requirements that were previously conditions 5.2.3 - 5.2.10. Conditions 4.2.4 and 4.2.5 had the minimum operating temperatures replaced with a reference to condition 4.1.2.d which requires the permittee to establish a minimum combustion operating temperature for each thermal oxidizer based on satisfying the respective minimum VOC Destruction Efficiency requirements of condition 4.1.2.c. Testing to establish the minimum operating temperatures shall be conducted once every 61 months from the previous compliance test.
- Condition 4.3.1 has been updated to reflect changes made to the cited R13-2410 condition.
- Condition 4.3.2 has been removed since the cited R13-2410 condition no longer exists.
- Old Condition 4.4.1 was replaced since the cited R13-2410 condition no longer exists. The new condition is for the record of monitoring.

- Old Condition 4.4.2. was replaced since the referenced conditions 4.1.2, 4.1.3, 4.1.4, and 4.1.5 have been changed and the required monitoring of old condition 4.4.2 is no longer relevant.
- Added conditions 4.4.3 - 4.4.6 to incorporate new recordkeeping requirements of R13-2410F.
- Added conditions 4.4.7 - 4.4.9. These conditions were CAM recordkeeping requirements previously included in the old section 5.0 as conditions 5.4.5 - 5.4.7.
- Added condition 4.5.1 to incorporate the reporting requirement of R13-2410F.
- Added condition 4.5.2. This condition was the CAM reporting requirements previously included in the old section 5.0 as condition 5.5.2.
- Moved the CAM Plan Summary of Requirements for Thermal Oxidizers No. 1, 2, and 3 (1C, 2C, and 3C) to Sections 4.7, 4.8, and 4.9 respectively. Updated CAM Plans in sections 4.8 and 4.9 to account for condition 4.1.2.d which requires the establishment of minimum operating temperatures.

5.0 Storage Tanks

- Section 5.0 contained conditions for the thermal oxidizers. The thermal oxidizers' applicable requirements were moved to Section 4.0 Coating Operations..
- Added condition 5.1.1 to incorporate the R13-2410F emission limits for the bulk storage tanks (15S, 16S, and 30S).
- Added condition 5.1.2. to incorporate the requirement for the operation and maintenance of air pollution control equipment.
- Added condition 5.2.1 to incorporate the R13-2410F monitoring requirement for bulk storage tanks (15S, 16S, and 30S).
- Added conditions 5.4.1 - 5.4.5 to incorporate the R13-2410F recordkeeping requirements for bulk storage tanks (15S, 16S, and 30S).

6.0 Cleaning Operations

- Section 6.0 was added to incorporate the R13-2410F requirements for cleaning operations at the facility. These include emission limits, monitoring, and recordkeeping.

Non-Applicability Determinations

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

- a. **40 C.F.R. Part 60 Subpart TT** - 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 40 C.F.R. Part 60 Subpart TT.
- b. **40 C.F.R. Part 63 Subpart KKKK** - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans. The Trivium Packaging USA Inc. Weirton Plant reduced their HAP emission limitations (per permit R13-2410) by modifying their use of coatings, cleaners, pastes and thinners to become a synthetic minor source under 40 C.F.R. Part 63 Subpart KKKK.
- c. **40 C.F.R. Part 63 Subpart SSSS** - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil. The Trivium Packaging USA Inc. Weirton Plant is an area source of HAP and therefore the coating line is not an affected source under Subpart SSSS.

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
304/926-0499 ext. 41286
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.