

# Fact Sheet



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

Permit Number: **R30-00900027-2018**  
Application Received: **March 6, 2017**  
Plant Identification Number: **03-054-009-00027**  
Permittee: **Maple Manufacturing, LLC**  
Mailing Address: **3010 Birch Drive, Weirton, WV 26062**

*Revised: N/A*

---

Physical Location:	Weirton, Brooke County, West Virginia
UTM Coordinates:	531.9 km Easting • 4,470.8 km Northing • Zone 17
Directions:	From downtown Weirton, south on Rt.2 to Freedom Way. Right on Freedom Way to Birch Drive. On Birch Drive approximately 1 mile. Facility is on the right side of road in Weirton Steel complex in Half Moon Park.

---

### Facility Description

The plant receives coils of tin-plated steel which it cuts into sheets and coats with inks and protective varnishes. The sheets are cured in natural gas-fired ovens and either transferred to the end department to be pressed into ends or shipped off site to be made into food can bodies. The facility is characterized by SIC Code 3411, and NAICS Code 332431.

The facility consists of two buildings: No. 33 and No. 720. The combined operation includes (i) a coating department with eleven (11) sheet coating lines; (ii) a lithography department with four (4) printing/sheet coating lines; and (iii) an end department with six (6) end making lines (two of which, MD-2 and MD-6, apply water-based end compound and have no VOC emissions). All eleven coating lines are controlled by permanent total enclosures (Method 204 PTEs) and four (4) different thermal oxidizers. Three of the four sheet coater lines (PC-3, PC-6, and PC-7) are controlled by capture hoods and one of the thermal oxidizers. The fourth coater line (PC-8) has no control device, but uses only ultraviolet coatings and has comparatively minimal emissions. The end making lines have no control device.

However, the new permittee operates a limited number of the emissions units, which are discussed below.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2016 Actual Emissions</b>
Carbon Monoxide (CO)	58.0	11.47
Nitrogen Oxides (NO <sub>x</sub> )	69.0	13.65
Particulate Matter (PM <sub>2.5</sub> )	Not available	0.26
Particulate Matter (PM <sub>10</sub> )	5.2	0.26
Total Particulate Matter (TSP)	5.2	1.04
Sulfur Dioxide (SO <sub>2</sub> )	0.4	0.08
Volatile Organic Compounds (VOC)	1,170.4	65.45
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2016 Actual Emissions</b>
Glycol ethers	> 10	0.25
Xylene	> 10	1.86
Methyl Isobutyl Ketone	< 10	1.26
Ethyl Benzene	< 10	0.36
Isophorone	< 10	0.02
Cumene	< 10	0.07
Naphthalene	< 10	0.12
Benzene	< 10	Not available
Toluene	< 10	0.02
Formaldehyde	< 10	0.01
Vinyl Acetate	< 10	Not available
Cresols	< 10	Not available
Aggregate HAPs	343	3.97

<sup>1</sup> Actual emissions are from the State and Local Emissions Inventory System (SLEIS) Total Emissions by Source Summary Report accessed on November 7, 2017.

**Title V Program Applicability Basis**

This facility has the potential to emit 1,170.4 tpy of VOCs; over 10 tpy of glycol ethers; over 10 tpy of xylene; and 343 tpy of aggregate HAPs. Due to this facility's potential to emit over over 100 tpy of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tpy of aggregate HAPs, Maple Manufacturing, LLC 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	Open burning prohibited.
	45CSR7	Prevention and Control of Particulate Matter
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction/modification
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart KKKK	Surface Coating of Metal Cans MACT
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 (if any)
R13-2111A	April 10, 2001	
R13-1458D	April 30, 2010	
R13-1546	December 22, 1992	
R13-2295F	March 13, 2014	

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

### Background Information

Due to a change in ownership of several emission units at the facility, and the transfer of the NSR and current Title V permit to the new owner/operator, the following background information has been provided to assist in understanding the rationale for each of the changes for this Title V permit renewal. In the following discussions, the terms “current permit” or “current Title V permit” refer to Title V Operating Permit R30-00900027-2012.

#### Change of Ownership & Transfer of Permits

Ball Corporation sold an interest in its Ball Metal Food Container Corporation facility in Weirton, West Virginia, to Maple Manufacturing, LLC during the current permit term. In Ball Corporation’s letter to the Director dated 3/3/2017, it was stated that Ball Corporation will have no further responsibility for the operation of this facility after 4/1/2017. Ball Corporation submitted a timely and complete Title V renewal application (received complete on 3/6/2017). In Maple Manufacturing, LLC’s letter to WVDAQ dated 3/2/2017, the responsible official stated that he has reviewed the renewal application and current permit, and will abide by and comply with the permit. Consequently, in the Director’s letter to the permittee dated 3/22/2017, the current Title V permit R30-00900027-2012 was transferred from Ball Corporation to Maple Manufacturing, LLC.

#### Status of Emission Units

According to 8/22/2017 technical correspondence from the permittee, the permittee owns or operates the following equipment:

- a. Wagner Sheet Coaters C-1 through C-4 (Em. Unit IDs: C-1 through C-4; Em. Pt. IDs: 33-1E, 33-6E);
- b. No. 11 LTG-1 Sheet Coater and Oven (Em. Unit IDs: 007-01, 007-02; Em. Pt. ID: 33-7E); and
- c. Three thermal oxidizers TO-1, TO-2, and 0003 (Em. Pt. IDs: 33-1E, 33-6E, 33-7E).

According to the 8/22/2017 technical correspondence, other emission units in the current Title V permit are neither owned nor operated by Maple Manufacturing, LLC and according to the permittee, none of them were physically on the permittee’s leased property when the correspondence was written. As of the issuance of this renewal permit, the permittee has not submitted an application to WVDAQ to revise any underlying NSR permit or Title V permit to eliminate emission units not owned or operated by Maple Manufacturing, LLC; therefore, neither the facility-wide potential emissions have been modified from those submitted by Ball Corporation for the entire facility in this renewal application, nor have the emission units not utilized by the permittee been excluded from the renewal permit.

### Changes for the Title V Permit Renewal

The following changes have been made in the current operating permit in order to generate the renewal permit:

1. **Emission Units Table.** The emission units table in permit section 1.1. has been revised to distinguish the emission units and control devices in Building No. 33 that are utilized by Maple Manufacturing, LLC, from those owned or operated by others. In addition, the Building No. 720 description of the table has been revised to indicate that Maple Manufacturing, LLC does not utilize any equipment associated with this building at the time of this permit renewal.
2. **Facility-wide Reporting Requirements.** The “boilerplate” reporting conditions 3.5.3., 3.5.5., and 3.5.6. have been revised to include information for electronic submittal.

3. **Permit Shield.** The language “the permittee” has been replaced with “Ball Corporation” in permit shield paragraphs 3.7.2.b. and 3.7.2.c. to clarify that Maple Manufacturing, LLC did not provide the information.
4. **45CSR13, Permit No. R13-1546.** NSR permit R13-1546 is active according to DAQ’s database, and applies to the end seal lining machine MD-2. However, R13-1546 was not among the permits listed in the Director’s letter dated March 22, 2017 to the permittee, regarding the transfer of permits previously issued to Ball Metal Food Container Corporation to Maple Manufacturing, LLC. Nevertheless, the permittee stated in its letter to WVDAQ dated 3/2/2017, that the responsible official has reviewed the renewal application and current permit, and will abide by and comply with the permit. Since permit R13-1546 is active, and applies to emission unit MD-2 located in Building No. 33 that is in the current Title V permit, the requirements for MD-2 have been retained in the Title V renewal permit as conditions 5.1.5. and 5.1.6. This should not pose any additional burden to the permittee since MD-2 is not among the emission units owned or operated by the permittee.
5. **45CSR13, Permit No. R13-2295F.** The current Title V permit embodies applicable requirements in R13-2295D. During the permit term, the permittee submitted application R13-2295E, which was withdrawn on October 24, 2013. On November 20, 2013, DAQ received an application for R13-2295F, which was approved on March 13, 2014. The purpose of the Class I Administrative Update permit R13-2295F was to make the following changes at the facility:
  - a. Remove the lithographic sheet coating lines PC-4 (003-03) and PC-5 (003-05).
  - b. Modify existing line PC-3 (71) as follows:
    - i. Remove three (3) printing presses (two are UV and one is conventional, 002-01, 002-02, and 002-03);
    - ii. Install four (4) UV presses (002-01, 002-02, 002-03, and 002-04);
    - iii. Remove one (1) sheet coater (applied only conventional varnish 003-01);
    - iv. Install one (1) sheet coater (applies both conventional and UV varnishes 003-01); and
    - v. Install one (1) UV curing oven (002-05).
  - c. Remove one (1) UV press and one (1) conventional press from existing line PC-4 (002-04 and 002-05).
  - d. Remove one (1) UV press and one (1) conventional press from existing line PC-5 (002-06 and 002-07).

The revisions permitted in R13-2295F have been incorporated into the renewal Title V permit as discussed in the following table:

<b>R13-2295F</b>	<b>Title V</b>	<b>Discussion</b>
1.0	1.1.	The following changes have been made in the emission units table: <ul style="list-style-type: none"> <li>• For emission unit IDs 002-01 through 002-05, and 003-01 revised the emission unit description, installation date, and design capacity.</li> <li>• Removed PC-5 HOE UV Press (002-06) and PC-5 Conventional Press (002-07).</li> <li>• Removed the No. PC-4 Wagner Sheet Coater (003-03) and No. PC-5 Wagner Sheet Coater (003-05).</li> <li>• For the coaters identified as emission units 001-01, 001-03, 001-05, 001-07, 001-09, and 001-11, deleted the italicized parenthetical statements concerning Ball Corporation’s internal designation of the coater numbers since this information is no longer relevant to the Title V permit for Maple Manufacturing, LLC.</li> </ul>

R13-2295F	Title V	Discussion
4.1.1.	10.1.9.	The current operating permit language for LTG2 in condition 7.1.6. is no longer in the NSR permit, and has been replaced with new requirements regarding removal of lines PC-4 and PC-5. Therefore, the content of renewal condition 7.1.6. has been deleted and the condition number reserved. The NSR requirement is now in condition 10.1.9. of the renewal permit.
4.1.2.	10.1.10.	The current operating permit listed condition 4.1.2. of R13-2295D in the permit shield section 3.7.2.d. This permit shield section has been removed for the renewal operating permit as it pertained to removing old coating line LTG C-7 from service prior to placing LTG-1 into service. However, the new requirement 4.1.2. of R13-2295F pertains to PC-3 equipment upgrades, which has been written in the renewal permit as condition 10.1.10. The descriptions 002-04 and 002-05 in the "Disconnect and Remove" column have been corrected to reflect the descriptions in section 1.1. of the current operating permit.
4.1.2.1.	10.1.11.	The requirement has been included in the renewal permit.
4.1.2.2.	10.1.12.	The requirement has been included in the renewal permit.
4.1.2.3.	10.1.8.	The requirement has been added as a separate citation of authority for the current condition 10.1.8. that embodies the capture system bypass line requirements in Section 10 of the permit. A separate citation has been written since it applies only to PC-3. In addition, the citation of §63.3557(b) in the NSR permit requirement has been added to the Title V condition, which implies that for PC-3 the <i>control efficiency/outlet concentration option</i> (cf. §§63.3550 through 63.3557) may be utilized, even though the current permit only provided that the <i>emission rate with add-on controls option</i> will be utilized (cf. §§63.3540 through 63.3547). However, since PC-3 must be fitted with a Method 204 permanent total enclosure (PTE) in accordance with underlying requirement 4.1.2.1., the <i>control efficiency/outlet concentration option</i> may be utilized for PC-3 (cf. §63.3491(d)). Therefore, the <i>control efficiency/outlet concentration option</i> specified in §63.3491(d) has been added to condition 10.1.4. as sub-condition c. for PC-3 only.
4.1.3.	7.1.7.	While the substantive requirement to reduce total HAPs by at least 97% did not change, the condition has been revised to reflect the content of the underlying permit.
4.1.4.1.	7.1.2.	While the substantive requirement for LTG-1 to utilize a Method 204 PTE did not change, the first paragraph of the condition has been revised to reflect the content of the underlying permit.
4.1.4.2.	8.1.5.	While the substantive requirement for each of the listed coaters to utilize a Method 204 PTE did not change, the first paragraph of the condition has been revised to reflect the content of the underlying permit. Additionally, the title of the table has been revised by changing the word "New" to "Tested".
4.1.5.	7.1.4. (LTG-1)  8.1.2. (Bldg. No. 720 C-1 through C-6)	While the substantive requirement for each of the listed coaters to utilize a Method 204 PTE did not change in conditions 7.1.4. and 8.1.2., the conditions have been revised to reflect the content of the underlying permit.  Permit condition 10.1.13. is a new Method 204 PTE requirement due to the modification of existing line PC-3.

R13-2295F	Title V	Discussion
	10.1.13. (PC-3)	Since underlying requirement 4.1.5. applies to sources in different sections of the Title V permit, it has been written in the respective sections but containing only the source in that section affected by the requirement.
4.1.6.	3.1.12.	The requirement has been included in the renewal permit.
4.1.7.	3.1.12.	The requirement has been included in the renewal permit.
4.1.8.	7.1.3.	While the substantive requirement for combustion chamber temperature did not change, the condition has been revised to reflect the content of the underlying permit.
4.1.9.	3.1.13.	The revised underlying requirement adds to its applicability the Building No. 720 sheet coating line PC-3 PTE and thermal oxidizer by specifying them in the requirement. This was done since the primary scope of permit R13-2295F was modifying PC-3. However, considering that the SSM Plan requirement applies to all MACT Subpart KKKK affected sources at the facility, the language in current Title V permit condition 3.1.13. will be retained without modifying to match verbatim the underlying NSR permit requirement. Furthermore, the permittee does not currently operate any equipment in Building No. 720; therefore, the permittee will not need to develop an SSMP for PC-3.
4.1.10.	7.1.5. (LTG-1)  9.1.2. (PC-8)  10.1.14. (PC-3)	In conditions 7.1.5. and 9.1.2., added the column for the building number. In the second column revised the column title from "Source Description" to "Equipment/Line".  Permit condition 10.1.14. was added to the Title V permit for modified sheet coating line PC-3.
4.1.11.	3.1.27.	The bold font text at the beginning of the paragraph has been added to reflect the underlying permit. Though not changed in the underlying NSR permit revision, the Title V permit will continue to require that compliance be demonstrated on a 12-month rolling total rather than a calendar year basis since the latter is not practically enforceable.
4.1.12.	8.1.3. 10.1.5.	The underlying requirement will continue to be cited in the Title V permit conditions. The bold font text at the beginning of the paragraph has been added to reflect the underlying permit in permit condition 10.1.5.
4.1.13.	8.1.1. 10.1.6.	The bold font text at the beginning of the paragraph has been added to reflect the underlying permit in both Title V permit conditions.
4.1.14.	3.1.28.	The underlying requirement will continue to be cited in the Title V permit condition.
4.2.1.	3.2.6.	The bold font text at the beginning of the paragraph has been revised to reflect the underlying permit.  Since the Title V condition is facility-wide and covers multiple pieces of equipment at the facility, but this specific underlying requirement 4.2.1. applies only to the integrated thermal oxidizer 0003 and thermal oxidizers 0001, the citation of the underlying requirement has been extracted from the citation of authority and written as a separate citation to clarify that this underlying permit requirement does not apply to all control devices at the facility and to maintain this condition in the facility-wide section 3 of the renewal permit.

R13-2295F	Title V	Discussion
4.2.2.	3.2.9.	Citation of authority has been revised for the same reason stated above concerning Title V condition 3.2.6.
4.3.1.	10.3.2.	The requirement has been incorporated into the renewal permit since it applies to modified sheet coating line PC-3. This underlying requirement had been in the current permit shield section 3.7.2.e. since the performance testing requirement for LTG-1 in 4.3.1. of R13-2295D had been completed. However, requirement 4.3.1. of R13-2295F is for the calibration of temperature measuring devices, and is renewal permit condition 10.3.2.
4.4.1.	3.4.1.	The requirement has been retained in the renewal permit.
4.4.2.	3.4.5.	The requirement has been retained in the renewal permit.
4.4.3.	3.4.6.	The requirement has been retained in the renewal permit.
4.4.4.	7.4.1. (LTG-1)  9.4.1. (PC-8)  10.4.3. (PC-3)	The requirement has been retained in renewal permit conditions 7.4.1. and 9.4.1. However, the language "Fountain Solution" in condition 7.4.1.(a) has been replaced with "etc." to reflect the underlying permit. Permit condition 10.4.3. has been added to the Title V permit for modified sheet coating line PC-3.

Other changes listed below were made in the renewal operating permit based upon changes permitted in R13-2295F:

- Condition 8.2.1. – Deleted the reference to 003-03 and 003-05.
- Section Heading 10.0 – Deleted the reference to 003-03, 003-05, 002-06, and 002-07.
- Condition 10.2.1. – Deleted the reference to 003-03 and 003-05.

6. **Compliance Plan Conditions.** Certain compliance plan conditions (located in subsection 6 of each permit section) in the permit have been revised as follows:

- a. The statement explaining why there is no facility-wide compliance plan in current permit condition 3.6.1. has been deleted and "Reserved".
- b. The statement explaining why there is no compliance plan in current permit condition 4.6.1. has been deleted and "Reserved".

According to the renewal application Attachment E, Coater C-7 in Building No. 720 is still inactive and is not yet equipped with a Method 204 permanent total enclosure (PTE). Therefore, the compliance plan pertaining to the utilization of a Method 204 PTE in permit condition 8.6.1. will remain in the renewal permit. However, since Maple Manufacturing, LLC does not utilize the equipment in Building No. 720, the word "permittee" has been changed to "owner/operator" in conditions 8.6.1.c., d., and f.

7. **Miscellaneous Changes.**

- a. Notes regarding Compliance Options under 40 C.F.R. 63 Subpart KKKK.
  - i. Condition 4.1.3. – The note has been retained since the permittee confirmed in 9/8/2017 technical correspondence that it will continue to utilize the *Control efficiency/outlet concentration option* in 40 C.F.R. §63.3491(d).



- ii. Condition 5.1.4. – The note has been deleted for the renewal since the permittee confirmed in 8/22/2017 technical correspondence that it does not own or operate the Building No. 33 End Liners.
- iii. Condition 7.1.8. – The note has been retained since the permittee confirmed in 9/8/2017 technical correspondence that it will continue to utilize the *Control efficiency/outlet concentration option* in 40 C.F.R. §63.3491(d).
- iv. Condition 8.1.6. – The note has been deleted for the renewal since the permittee confirmed in 8/22/2017 technical correspondence that it does not own or operate the Building No. 720 Sheet Coaters No. C-1 through C-6.
- v. Condition 9.1.3. – The note has been deleted for the renewal since the permittee confirmed in 8/22/2017 technical correspondence that it does not own or operate the Building No. 720 Planeta Press PC-8.
- vi. Condition 10.1.4. – The note has been deleted for the renewal since the permittee confirmed in 8/22/2017 technical correspondence that it does not own or operate the Building No. 720 Press-Coater-Oven Lines PC-3, PC-4, PC-5, PC-6, and PC-7.

### 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. 60, Subpart TT - Standards of Performance for Metal Coil Surface Coating** – The fact sheet for permit R30-00900027-1995 states that, *“This facility cuts the metal coils prior to coating, and as such, is not applicable to Subpart TT. However, since Ball is similar to Subpart TT type facilities and has approximately the same capture and destruction rates, there were conditions in the R13 permit that required emission tests to be done in accordance with methods set forth in NSPS Subpart TT.”* The facility is not directly subject to Subpart TT, but is subject to certain requirements of Subpart TT that are incorporated by reference into applicable permit conditions. But permit R13-1458D, condition 4.2.1. references Subpart TT, and the required performance testing methodologies that are specifically set forth by R13-1458D are those found in paragraphs §60.463 and §60.466 of Subpart TT.
- b. **Condition 4.1.6. of Permit R13-1458D.** This requirement remained in effect until the Air Preheater F147 was replaced with the MEGTEC Cleanswitch® regenerative thermal oxidizer identified as TO-1. Ball Corporation confirmed in a 4/3/2012 email to DAQ that the replacement has been completed; therefore, this requirement is no longer applicable.
- c. **Condition 4.1.7.f. of Permit R13-1458D.** This requirement was to calibrate the temperature measuring system within 30 days of startup of TO-1. Ball Corporation confirmed in a 6/21/2012 email to DAQ that startup was in March 2010 and the monitoring system had been calibrated twice since startup; therefore, this requirement is no longer applicable.

### 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: January 5, 2018  
Ending Date: February 5, 2018

**Point of Contact**

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

Denton B. McDerment, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478  
[denton.b.mcderment@wv.gov](mailto:denton.b.mcderment@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)**

No comments were received from either the public or U.S. EPA.