

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on August 26, 2008.

Permit Number: **R30-00900054-2008**
Application Received: **May 7, 2012**
Plant Identification Number: **03-54-00900054**
Permittee: **Precoat Metals Corporation**
Facility Name: **Weirton**
Mailing Address: **4502 Freedom Way; Weirton, WV 26062**

Permit Action Number: *SM01* Revised: December 11, 2012

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 534.83 km Easting • 4,474.18 km Northing • Zone 17
Directions: From Wheeling, take route West Virginia 2 N. Travel 22 miles and then merge onto US 22 East. Take Exit 2 (Main Street) towards downtown Weirton. Turn left on Freedom Way. Plant is on the left.

Facility Description

Precoat Metals' Weirton plant is a metal coil coating facility, covered by NAICS code 332812, with a maximum capacity of 158,231.5 pounds of metal coil coated per hour.

This significant modification addresses the changes covered by R13-1910D for the installation of an Infrared Drying Oven.

The company also wishes to change the parameters monitored for the capture system monitoring plan required by 40 C.F.R 63 Subpart SSSS.

Emissions Summary

The installation of the infrared drying oven will result in the following changes to potential emissions:

Pollutant	Change in Potential Emissions (+ or -), TPY
CO	+1.62
NO _x	+1.97
SO ₂	+0.01
PM/PM ₁₀	+0.15
VOC	+0.11

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 229.6 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Precoat Metals 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	Preconstruction permits for minor sources
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40CFR63 Subpart SSSS	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil.

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>)
R13-1910D	July 30, 2012	

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

To the Emission Units Table a new emission unit 8s (8e), a natural gas-fired infrared oven, was added. Also it was noticed that for emission units 4e-1 and 4e-2 that the design capacities differed between the R13 permit and the Title V permit. Upon conferring with the company it was determined that the design capacity of 36 mmBtu/hr contained in the R13 permit was correct and the correction was made to the Title V Emission Units Table.

The following updates were made to the boilerplate language in Section 3.0 Facility Wide Requirements: Citation in condition 3.1.3. and the EPA address in condition 3.5.3.

To reflect the addition of titles to R13-1910D emission limit tables, the tables in the following Title V conditions have been titled: 4.1.1., 5.1.1., 6.1.1., 7.1.1., 8.1.1.

In conditions 9.1.10 and 9.1.11 the pressure drops in the downstairs and upstairs coating rooms have been updated with pressures monitored during the most recent performance test conducted in August of 2009. Also the citation “40 C.F.R. § 63.5150(a)(4)” has been added since the pressure drops are the parameters monitored to show that capture efficiency is maintained, under 40 C.F.R. 63, Subpart SSSS.

Section 10.0 Source-Specific Requirements (Infrared Drying Oven – 8e) was added to incorporate the requirements for the new Infrared Drying Oven from R13-1910D.

Non-Applicability Determinations

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

45CSR2: To Prevent and Control Air Pollution from Combustion of Fuel in Indirect Heat Exchangers – In an infrared (IR) oven, combustion of gas heats emitters which in turn radiate heat used to dry the metal coil, and is classified as an indirect heat exchanger. Therefore, under 45CSR§2-11 the unit is exempt since the unit is less than 10 mmBtu/hr.

45CSR10: To Prevent and Control Air Pollution from the Emission of Sulfur Oxides –As a fuel burning unit that is part of a manufacturing process the unit is exempt under 45CSR§10-10.1 since the unit is less than 10 mmBtu/hr.

40 C.F.R. 64 Compliance Assurance Monitoring (CAM) – The IR Drying Oven has no control devices therefore it is not subject to CAM.

Tailoring Rule for Greenhouse Gas Emissions- The Weirton Precoat Metals facility is currently not a major GHG source, nor are the emissions from the project in excess of 75,000 tons/year of CO₂e. Therefore Step 2 of the Tailoring Rule does not apply.

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: October 26, 2012
Ending Date: November 26, 2012

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

Robert Mullins
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

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

Response to Comments (Statement of Basis)

Not applicable.