

Fact Sheet



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

Permit Number: **R30-00900130-2017**

Application Received: **April 11, 2017**

Plant Identification Number: **009-00130**

Permittee: **Business Development Corporation of the Northern Panhandle**

Facility Name: **Beech Bottom Plant**

Mailing Address: **324 A Penco Road, Weirton, WV 26062**

Physical Location: Beech Bottom, Brooke County, West Virginia
UTM Coordinates: 529.16 km Easting • 4451.53 km Northing • Zone 17
Directions: Facility is located on the west side of WV St. Rt. 2, just south of Beech Bottom

Facility Description

Business Development Corporation of the Northern Panhandle (BDC) purchased Wheeling Corrugating Company in 2012. Shortly afterwards, Jupiter Aluminum Corporation (Jupiter) purchased one of two coil coating lines at the facility (Coil Coating Line #1), and applied for the transfer of NSR Permit R13-2379C and Operating Permit R30-00900004-2012. Since these permits regulated both Coil Coating Line #1 (CCL#1) and Coil Coating Line #2 (CCL#2), and Jupiter only purchased CCL#1, Jupiter applied to have both the operating permit and the NSR permit split into two permits. DAQ approved this request and the two permits were split as: Permit R13-2379D (CCL#1), Permit R13-3265 (CCL#2), Title V Permit R30-00900004-2012 (1 of 2) (CCL#1), and Title V Permit R30-00900004-2012 (2 of 2) (CCL#2). On July 21, 2016, Jupiter submitted a request to transfer Title V Permit R30-00900004-2012 (2 of 2) with CCL#2 and Miscellaneous Operations to the BDC. The DAQ approved this transfer request via letter dated September 23, 2016.

The facility manufactures coated metal coils under Standard Industrial Classification (SIC) code 3479. The facility also includes roadways, storage piles and material handling.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|----------------------------------------------------|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2015 Actual Emissions |
| Carbon Monoxide (CO) | 9.35 | 0.81 |
| Nitrogen Oxides (NO _x) | 14.48 | 1.08 |
| Particulate Matter (PM _{2.5}) | 0.87 | 0.62 |
| Particulate Matter (PM ₁₀) | 0.87 | 0.62 |
| Total Particulate Matter (TSP) | 0.87 | 0.82 |
| Sulfur Dioxide (SO ₂) | 0.08 | 0.01 |
| Volatile Organic Compounds (VOC) | 11.66 | 0.87 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2015 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| Total HAPs | 4.13 | 0.05 |

*Some of the above HAPs may be counted as PM or VOCs.
 2015 Actual Emissions were for Jupiter Aluminum and Business Development Corporation combined.*

Title V Program Applicability Basis

Business Development Corporation of the Northern Panhandle's Beech Bottom Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30 in accordance with 45CSR§30-3.1.a.3. The facility was a major source of HAPs at the first compliance date of 40 CFR 63, Subpart SSSS and is therefore subject to this MACT because of once in, always in.

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 | Particulate Matter Emission |
| 45CSR10 | Sulfur Oxides Emissions |
| 45CSR11 | Standby plans for emergency episodes |
| 45CSR13 | NSR Permits |
| 45CSR16 | Performance Standards for New Stationary Sources |
| 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 CFR 60, Subpart TT | Metal Coil Surface Coating |
| 40 CFR Part 61 | Asbestos inspection and removal |
| 40 CFR 63, Subpart SSSS | Surface Coating of Metal Coil MACT |
| 40 CFR 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 (<i>if any</i>) |
|--------------------------------|------------------|------------------------------------------------------------------------------|
| R13-3265 | August 31, 2015 | |

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 have occurred since the last permit modification was issued:

Title V Boilerplate changes: Conditions 3.5.3., 3.5.5., and 3.5.6. were revised to address electronic submittal of documentation, including the annual certification and semi-annual monitoring reports, to the DEP.

Sections 4.0 and 5.0 of the previous permit were reserved because of changes. The renewal permit renumbered the Sections.

Previous permit conditions 6.2.1. and 6.2.2. were virtually identical, therefore Condition 6.2.1. was deleted, and the remaining Conditions in what is now Section 4.2. were renumbered.

Non-Applicability Determinations

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

- a. 45CSR17 - This rule does not apply, as stated in 45CSR§17-6.1. Sources that are subject to the fugitive particulate matter emission requirements of 45CSR7 are exempt from 45CSR17.
- b. 45CSR21 - This rule is not applicable because the facility is not located in any of the affected counties.
- c. 45CSR27 - This rule does not apply because this facility does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.
- d. 40 CFR Part 63, Subpart DDDDD Boiler MACT - The facility is not a major source of HAPs, therefore this subpart does not apply.
- e. 40 CFR Part 68 Risk Management Plan - This regulation is not applicable because none of the storage thresholds are triggered.

- f. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM) - This facility is subject to 40 CFR 63, Subpart SSSS and is therefore exempt from CAM in accordance with 40 CFR §64.2(b)(1).

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: Friday, August 4, 2017

Ending Date: Tuesday, September 5, 2017

Point of Contact

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

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West Virginia Department of Environmental Protection
Division of Air Quality
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Charleston, WV 25304
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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.