

Fact Sheet



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

Permit Number: **R30-00900012-2022**
Application Received: **October 14, 2021**
Plant Identification Number: **03-54-009-00012**
Permittee: **Trivium Packaging USA Inc**
Facility Name: **Weirton Plant**
Mailing Address: **3030 Birch Drive, Weirton, WV 26062**

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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	10.67	3.76
Nitrogen Oxides (NO _x)	9.63	4.48
Particulate Matter (PM _{2.5})	0.97	0.09
Particulate Matter (PM ₁₀)	0.97	0.09
Total Particulate Matter (TSP)	0.97	0.34
Sulfur Dioxide (SO ₂)	0.08	0.03
Volatile Organic Compounds (VOC)	142.71	14.81
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions
Total HAPs	22.37	10.82

Some of the above HAPs may be counted as PM or VOCs. This Facility is a synthetic minor for HAPs due to condition 4.1.10 (R13-2410E Condition 4.1.10) which requires that HAP emissions not exceed 10 tons per year of any individual HAP nor 25 tons per year of all combined HAPs.

Title V Program Applicability Basis

This facility has 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Minor New Source Review Permits for 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.
	40 C.F.R. Part 61	Asbestos inspection and removal
State Only:	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	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>)
R13-2410E	May 22, 2018	

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

This is the fourth Title V permit renewal for this facility. Due to the issuance of Consent Order CO-R30-E-2022-04, an application for minor modification R30-00900012-2017(MM02) was received on February 14, 2022, during the review period of this Title V renewal. The associated R13 permit (R13-2410F) was not completed in time to combine the minor modification with the Title V renewal. R30-00900012-2017(MM02) will be renamed R30-00900012-2022(MM01) and will be reviewed after R13-2410F has been issued.

Renewal R30-00900012-2022 changes:

3.0 Facility-Wide Requirements

- Boilerplate language was updated to the most recent version. No other changes were made to this section as part of the Title V renewal.

4.0 Coating Operations

- The note in condition 4.3.2 was updated to indicate when the most recent testing had taken place.
- Section 4.0 only has applicable requirements from R13-2410, therefore, no changes were made during the renewal.

5.0 Thermal Oxidizers

- There have been no changes to R13-2410, 45CSR6, 40 C.F.R. 64 (CAM), and the facility's CAM plan since the last renewal. Therefore, no changes were made to this section as part of the Title V renewal.

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.

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: July 22, 2022
Ending Date: August 22, 2022

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.