

Fact Sheet



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

Permit Number: **R30-00900014-2022**
Application Received: **January 07, 2022**
Plant Identification Number: **03-54-009-00014**
Permittee: **Crown Cork & Seal USA, Inc.**
Facility Name: **Weirton Plant**
Mailing Address: **3011 Birch Drive, Weirton, WV, 26062**

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 532.19 km Easting • 4470.82 km Northing • Zone 17
Directions: At the intersection of State Route 2 and US 22, go west on Freedom Way to Birch Drive. Turn right onto Half Moon Industrial Park and go to first building on the right.

Facility Description

Crown Cork & Seal USA, Inc. (SIC Code 3466 and NAICS Code 332115) manufactures decorative sheets from raw metal that arrives on flatbed trucks in a single, continuous coil. The continuous coil is unloaded by forklifts and moved to the plate shearing area. The Littell Coil Shearing Machine cuts and stacks the metal into individual sheets. The sheets are then moved by forklifts to the plain metal storage area until the desired coating and printing process begins. 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, with seven coater lines and a UV coating line, seven ovens, two incinerators and three presses.

This renewal incorporates modification permit R13-2067D into the Title V operating permit.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions**
Carbon Monoxide (CO)	15.93*	5.02
Nitrogen Oxides (NO _x)	18.96*	5.97
Particulate Matter (PM _{2.5})	1.44*	0.18
Particulate Matter (PM ₁₀)	1.44*	0.18
Total Particulate Matter (TSP)	1.44*	0.45
Sulfur Dioxide (SO ₂)	0.11	0.04
Volatile Organic Compounds (VOC)	118	11.38

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2020 Actual Emissions**
Cumene	9.4	< 0.01
Ethylbenzene	9.4	0.22
Formaldehyde	0.5	0
Isophorone	9.4	0.61
Methyl Isobutyl Ketone (MIBK)	9.4	0.80
Naphthalene	9.4	0.17
Phenol	9.4	0
Toluene	9.4	0.02
Xylene	9.4	1.26
Total HAPs	24.4	3.09

Some of the above HAPs may be counted as PM or VOCs.

* The potential emissions for carbon monoxide, nitrogen oxides, and particulate matter have increased due to the revisions associated with R13-2067D.

** Actual Emissions are from the State and Local Emissions Inventory System (SLEIS) report for 2020.

Title V Program Applicability Basis

This facility has the potential to emit 118 TPY of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of VOC, the Weirton Plant of Crown Cork & Seal 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.
	45CSR7	Prevent and control particulate matter air pollution from manufacturing processes and operations.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, and operation of stationary sources of air pollutants, notification requirements, administrative updates, temporary permits, general permits, and procedures for evaluation.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	WV Code § 22-5-4 (a) (15)	The Secretary can require the use of monitoring or reporting for the discharge of pollutants.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal.
	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
R13-2067D	October 03, 2022

Conditions from this facility's Rule 13 permit 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. All other conditions from this facility's Rule 13 permit 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 Title V operating permit is a renewal of R30-00900014-2017 and incorporates the changes made with the modification permit R13-2067D and the Title V minor modification R30-00900014-2017 (MM01). This revision corrected the design capacity of the Adwest Thermal Oxidizer (Emission Unit ID: TO-1) from 5.6 mmBTU/hr to 8.0 mmBTU/hr.

The following changes have been made to the current Title V operating permit for this permit renewal:

I. Section 1.0. – Emission Units

A. The design capacity of the control device TO-1 was corrected from 5.6 mmBTU/hr to 8.0 mmBTU/hr.

1. A discrepancy was noticed between the design capacity reported in the current Title V operating permit and the 2022 renewal application (5.6 mmBTU/hr) and the design capacity reported in the permit R13-2067C (5.0 mmBTU/hr).

a. The design capacities of TO-1 (2006) and TO-2 (2004) appear to have been switched in the 2006 renewal of the Title V operating permit following the permitting of the new unit TO-1 (2006) in R13-2067B.

b. With R13-2067C and R30-00900014-2012, TO-2 (2004) was replaced with a new unit TO-2 (2011). Thus, the design capacity of TO-2 was effectively corrected, but the design capacity of TO-1 remained incorrectly reported as 5.6 mmBTU/hr in the 2012 Title V operating permit. This incorrect value was carried forward in the 2017 renewal.

2. Upon asking Crown Cork & Seal USA, Inc. for confirmation of both incinerators' correct design capacities, the DAQ was informed that the actual design capacity of TO-1 is 8.0 mmBTU/hr (emails dated May 17-18, 2022). In order to correct this in both the Rule 13 and Title V permits, it was requested that the permittee apply for the modification R13-2067D and the minor modification R30-00900014-2017 (MM01). The changes associated with this revision have been incorporated into this 2022 renewal permit.

B. The R13 Permit number has been updated to R13-2067D which was issued on October 03, 2022.

II. Section 2.11. – Operational Flexibility

A. The authority of Condition 2.11.4. has been updated to 45CSR§30-2.40. due to a change in 45CSR30.

III. Section 2.22. – Credible Evidence

A. The authority of Condition 2.22.1. has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.

IV. Section 3.5. – Reporting Requirements – Facility-Wide Requirements

A. Condition 3.5.3. has been updated to show changes that have been made to the U.S. EPA designee/address.

V. Section 3.7 – Permit Shield – Facility-Wide Requirements

A. Condition 3.7.2.g. has been updated to include that any industrial hot water heaters (as defined in 40 C.F.R. §63.11237) that are utilized at the facility only combust natural gas and are under 120 U.S.

gallons. This information was provided by the permittee and was added to the permit to justify that the facility is not subject to 40 C.F.R. Part 63 Subpart JJJJJJ.

VI. Section 4.1. – Limitations and Standards – Coater Lines and Ovens

- A. The numbering of Conditions 4.1.13. through 4.1.19. of R13-2067C have been corrected to 4.1.11. through 4.1.17. in R13-2067D. Thus, the authorities of the Title V Permit Conditions 4.1.3. through 4.1.6. have been updated accordingly.

VII. Section 4.4. – Recordkeeping Requirements – Coater Lines and Ovens

- A. Paragraph f. of Condition 4.4.1. in the current (2017) permit has been removed as it is the same as 4.4.1.e.

VIII. Section 5.1. – Limitations and Standards – Thermal Oxidizers

- A. The maximum emission limits in Condition 5.1.6. have been updated in accordance with changes made in R13-2067D. The emission limits of thermal oxidizer TO-1 have increased for the following pollutants:

Pollutant	Maximum Hourly Emissions (lbs/hr)	Maximum Annual Emissions (tons/year)
Nitrogen Oxides	3.780	16.556
Carbon Monoxide	3.175	13.907
Particulate Matter - 10	0.287	1.258

- B. The numbering of Conditions 4.1.13. through 4.1.19. of R13-2067C have been corrected to 4.1.11. through 4.1.17. in R13-2067D. Thus, the authorities of the Title V Permit Conditions 5.1.7. through 5.1.10. and 5.1.13. have been updated accordingly.

IX. Section 5.3. – Testing Requirements – Thermal Oxidizers

- A. Condition 5.3.3. has been removed from the permit because the facility has met the condition. The facility has tested both the destruction and capture efficiencies since the initial operation of the Thermal Oxidizer (TO-2). The results of these tests are as follows:
1. The facility verified the destruction efficiency of TO-2 within the allotted 180-day period. Destruction efficiency testing was completed on March 21, 2012. The testing showed that the facility had a destruction efficiency of 99.98% which is in compliance of the permit.
 2. The Fact Sheet for the 2012 Renewal Permit notes the permanent total enclosure (PTE) surrounding the coating equipment was tested on March 29, 2007. From this testing, 100% capture efficiency was assumed because the PTE met the (4) specific engineering criteria (described in Method 204, 40 C.F.R. 51, Appendix M). Since no changes had been made to the physical structure of the PTE or any of the enclosed equipment between the PTE testing and the initial operation date of TO-2, the 2012 Fact Sheet states that “the capture efficiency for the new TO-2 may not be tested during the initial testing.”
 3. Since the initial operation of TO-2, PTE testing was completed in accordance with Method 204 on November 25, 2019 following modification to the existing PTE. The facility was found to be in compliance during this testing.

Non-Applicability Determinations

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

1. **45CSR10** – *To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides* – Since the oxidizers do not have the potential to emit 500 pounds per year of sulfur oxides, they are not subject to 45CSR§10-4 via 45CSR§10-4.1.e. The facility does not combust any refinery or process gas streams and it does not operate a coke production facility; therefore, it is not subject to 45CSR§10-5.
2. **45CSR10A** – *Testing, Monitoring, Recordkeeping, and Reporting Requirements Under 45CSR 10* – Since oxidizers are manufacturing process sources with the PTE for SO₂ less than 500 lbs/yr, the facility is not subject to 45CSR10A via 45CSR§10A-3.1.c.
3. **40 C.F.R. 60, Subpart TT** – *Standards of Performance for Metal Coil Surface Coating* – The subpart defines a 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 Subpart TT.
4. **40 C.F.R. 63, Subpart KKKK** – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans* – The Crown Cork & Seal USA’s Weirton Plant is a synthetic minor source for HAPs. This subpart applies only to major HAP sources.
5. **40 C.F.R. 64** – *Compliance Assurance Monitoring (CAM)* – The coaters, ovens, and presses are subject to emission limitations for which the permit specifies a continuous compliance determination method in conditions 5.2.2. and 5.4.4.; therefore, they are exempt from the requirements of the CAM per 40 C.F.R. §64.2(b)(1)(vi).
6. **40 C.F.R. 63, Subpart HHHHHH** – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Sources* – This subpart is not applicable to Weirton plant. The facility is a synthetic minor source (area source) of HAPs, but it does not conduct paint stripping using MeCl and does not use spray application of coatings (coatings are applied by lithographic roll coating). Therefore, this regulation is not applicable in accordance with 40 C.F.R. §63.11170.
7. **40 C.F.R. 63, Subpart JJJJJJ** – *National Emission standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* – The facility is an area source of HAP, however, any boilers utilized at the site combust natural gas only and any industrial hot water heaters utilized at the site combust natural gas only and have a capacity under 120 U.S. gallons. Therefore, the units are not subject to Subpart JJJJJJ and to any of its requirements in accordance with 40 C.F.R. §§63.11195(e-f).

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 14, 2022

Ending Date: November 14, 2022

Point of Contact

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41915
sarah.k.barron@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.