

Fact Sheet



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

Permit Number: **R30-00900054-2023**

Application Received: **April 6, 2023**

Plant Identification Number: **03-54-009-00054**

Permittee: **Precoat Metals Corp.**

Facility Name: **Weirton**

Mailing Address: **4502 Freedom Way, Weirton, WV 26062**

Physical Location:	Weirton, Brooke County, West Virginia
UTM Coordinates:	534.83 km Easting • 4474.18 km Northing • Zone 17
Directions:	From Wheeling, take Route West Virginia 2N. Travel 22 miles and then merge on to 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 Corp.'s Weirton facility is a metal coil coating facility with a maximum capacity of 158,231.5 pounds of metal coil coated per hour. The metal coil coating facility has a SIC code of 3479 and NAICS code of 332812. Metal coils delivered to the facility are run through the preclean section to remove oil from the surface of the strip. The strip then passes through the wet section for cleaning, rinsing, and chemical treatment. After the wet section, the strip is run through an infrared drying oven. Then, the metal strip passes through the coater room where primer is applied, and on through the primer oven to the quench/cooling area. From the quench/cooling area, the metal strip returns to the coater room where a top coat is applied. From the finish coater, the metal strip passes through the finish oven to the quench/cooling area. The prime and finish ovens exhaust to the afterburner (thermal oxidizer) and the waste heat is drawn through the waste heat boiler to generate steam for heating the wet section tanks. When steam is not required, the exhaust is directed through the bypass stack. Finished coils are packaged and shipped to other

locations for further processing. An onsite wastewater treatment system is operated to treat process wastewater from coil cleaning, rinsing, chemical treatment, and quenching.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	62.9	14.18
Nitrogen Oxides (NO _x)	70.3	16.88
Particulate Matter (PM _{2.5})	5.35	1.10
Particulate Matter (PM ₁₀)	5.35	1.10
Total Particulate Matter (TSP)	5.35	2.06
Sulfur Dioxide (SO ₂)	2.09	0.32
Volatile Organic Compounds (VOC)	229.6	57.94
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Chromium Compounds	0.07	0.04
Cumene	1.48	0.47
Dimethyl Formamide	18.66	None reported
Dimethyl Phthalate	4.14	0.02
Ethyl Benzene	5.41	0.46
Formaldehyde	0.44	0.02
Glycol Ethers	17.30	1.41
Hydrogen Chloride	<0.01	<0.01
Hydrogen Fluoride	0.50	0.01
Isophorone	36.45	2.27
Methyl Isobutyl Ketone (MIBK)	3.65	0.10
Naphthalene	13.81	0.89
Toluene	9.63	0.20
Xylene	12.82	1.9
Total HAPs	124.37	7.80
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
Other Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Phosphoric Acid	0.25	Not Reported
Nitric Acid	0.71	Not Reported

Title V Program Applicability Basis

This facility has the potential to emit 229.6 TPY VOC, 18.66 TPY Dimethyl Formamide, 17.30 TPY Glycol Ethers, 36.45 TPY Isophorone, 13.81 TPY Naphthalene, 12.82 TPY Xylene and 124.37 TPY of Total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Precoat Metals Corp. 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	Control of particulate matter from manufacturing processes.
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	New Source Performance Standards
	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 Hazardous Air Pollutants.
	40 C.F.R. Part 60, Subpart TT	Metal Coil Surface Coating
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart SSSS	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
	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 (<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," which may be downloaded from DAQ's website.

Determinations and Justifications

This is the fourth renewal of this Title V permit. There have been no changes to the facility's equipment since the issuance of the last Title V permit renewal. Therefore, the only changes made during this renewal were:

Section 3.0 - Facility-Wide Requirements

- Updated the boiler-plate language of 3.0 to the most recent version.

Section 4.0 - Source-Specific Requirements - Wet Section Process

- This Section contains applicable requirements from R13-1910 and 45CSR7. There have been no changes to R13-1910 and 45CSR7 since the last Title V renewal.

Section 5.0 - Source-Specific Requirements - Prime Coater Process and Finish Coater Process

- This Section contains applicable requirements from R13-1910 and 40 C.F.R. 60 Subpart TT. There have been no changes to R13-1910 and 40 C.F.R. 60 Subpart TT since the last Title V renewal.

Section 6.0 - Source-Specific Requirements - Prime Oven Process and Finish Oven Process

- This Section contains applicable requirements from R13-1910, 45CSR6, 45CSR7, 45CSR10, and 40 C.F.R. 60 Subpart TT. There have been no changes to R13-1910, 45CSR6, 45CSR7, 45CSR10, and 40 C.F.R. 60 Subpart TT since the last Title V renewal.

Section 7.0 - Source-Specific Requirements - Wastewater Treatment

- This Section contains applicable requirements from R13-1910. There have been no changes to R13-1910 since the last Title V renewal.

Section 8.0 - Source-Specific Requirements - Brush Unit Process

- This Section contains applicable requirements from R13-1910 and 45CSR7. There have been no changes to R13-1910 and 45CSR7 since the last Title V renewal.

Section 9.0 - 40 C.F.R. Part 63 Subpart SSSS Requirements

- 40 C.F.R. 63 Subpart SSSS was amended on February 25, 2020 and November 19, 2020. The following changes were made to this section during this Title V Renewal:
 - Condition 9.1.3 was updated with the most recent language from 40 C.F.R. §63.5121(a). Also, applicable requirements from Table 1 of 40 C.F.R. 63 Subpart SSSS were added to condition 9.1.3. This resulted in the removal of old conditions 9.1.6 - 9.1.9 since they included requirements of Table 1 to 40 C.F.R. 63 Subpart SSSS which are now incorporated into condition 9.1.3.
 - Condition 9.1.4 was updated with the most recent language of 40 C.F.R. §63.5140(a).
 - Added condition 9.1.5 to incorporate 40 CFR §63.5140(b).
 - Added condition 9.1.6 to incorporate 40 CFR §63.5140(c), which indicates which general provisions of Part 63 are applicable to Subpart SSSS.
 - Updated the average combustion temperature of the thermal oxidizer in condition 9.1.7 (previously condition 9.1.5) to that maintained during the most recent performance test conducted on December 4, 2019.
 - Updated the downstairs coating room pressure drop and the upstairs coating room pressure drop parameters in conditions 9.1.8 and 9.1.9 (previously conditions 9.1.10 and 9.1.11) to those established during the most recent performance test conducted on December 4, 2019.
 - Added Condition 9.1.10 to include 40 C.F.R. §63.5170 which contains the Compliance Demonstration Requirements Index.
 - In the previous Title V renewal, the requirements of 40 C.F.R. §63.5170(f) were partially incorporated by reference, therefore, the entire requirement was added as condition 9.1.12. This includes the old conditions 9.1.13 - 9.1.15 which were combined and added to the new condition 9.1.12.
 - Condition 9.2.1 was updated with the most recent language of 40 C.F.R. §63.5150(a).
 - Condition 9.2.2 was updated with the most recent language of 40 C.F.R. §63.5150(b).
 - Added Conditions 9.3.1 - 9.3.3 to incorporate the applicable testing requirements of 40 C.F.R. §63.5160.
 - Condition 9.4.1 was updated with the most recent language of 40 C.F.R. §63.5190(a).
 - Added condition 9.4.3 to incorporate 40 C.F.R. §63.5190(c).
 - Added conditions 9.5.1 - 9.5.3 to incorporate 40 C.F.R. §§63.5180(c), (d), and (e).
 - Previous condition 9.5.1 was deleted because these requirements no longer apply after August 24, 2020.
 - Condition 9.5.4 (previously 9.5.2) was updated with the most recent language of 40 C.F.R. §63.5180(g).
 - Condition 9.5.5 (previously 9.5.3) was updated with the most recent language of 40 C.F.R. §63.5180(h).
 - Added conditions 9.5.6 - 9.5.10 to incorporate 40 C.F.R. §§63.5181(a) - (e).

Section 10.0 - Source-Specific Requirements - Infrared Drying Oven

- This Section contains applicable requirements from R13-1910. There have been no changes to R13-1910 since the last 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. 45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers. Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 45CSR2.
- b. 45CSR21 - Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. Since the Precoat Metals facility is located in Brooke County, this facility is not subject to 45CSR21.
- c. 45CSR27 - To Prevent and Control the Emissions of Toxic Air Pollutants. Potential formaldehyde emissions (0.44 tpy or 880 lbs/yr) from the Precoat Metals facility are below the applicability threshold of 1000 pounds per year. Therefore, Precoat Metals is exempted from 45CSR27.
- d. 40 C.F.R. 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 40 C.F.R. Part 60 Subpart Dc.
- e. 40 C.F.R. 63 Subpart JJJJ - Paper and Other Web Coating. Precoat Metals is subject to 40 C.F.R. 63 Subpart SSSS and therefore is not an affected source under 40 C.F.R. 63 Subpart JJJJ per 40 C.F.R. §63.3300(e).
- f. 40 C.F.R. 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Waste heat boilers are excluded from the definition of Boiler in §63.7575. Therefore, the waste heat boiler (4e-2) is not subject to this subpart.
- g. 40 C.F.R. Part 64 - Precoat Metals' Pollutant Specific Emission Units, Prime and Finish Ovens (4s and 5s), are not subject to the Compliance Assurance Monitoring (CAM) rule because they are subject to 40 C.F.R. Part 63 Subpart SSSS which was proposed after November 15, 1990. The applicable emission limitation for these units is exempt under 40 C.F.R. §64.2(b)(1)(i).

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: September 8, 2023
Ending Date: October 9, 2023

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.