



Ball Corporation
Packaging Operations
9300 West 108th Circle, Broomfield, CO 80021-3682 (303)460-5530 Fax (303)460-5238

August 27, 2015

EHS15-L-109
Certified

William Durham
Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

RE: Permit Determination - Ball Metal Food Container, LLC

Dear Mr. Durham:

Enclosed please find a Permit Determination Form and supporting documentation for Ball Metal Food Container, LLC (Ball) located in Weirton, WV. The facility is planning to replace its LTG sheet coater with a Wagner sheet coater to match its three other Wagner coaters. The replacement is being performed for consistency and will not result in an increase in the amount or type of emissions from the coater.

If you would like further information, please call me at (303) 460-5601.

Sincerely,

John Munsch
EHS Department
Ball Corporation

Attachments

cc: A. Hecht, Plant Manager – 33*



WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

**PERMIT DETERMINATION FORM
(PDF)**

FOR AGENCY USE ONLY: PLANT I.D. # _____
PDF # _____ PERMIT WRITER _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):

Ball Metal Food Container LLC

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE:

332431

4A. MAILING ADDRESS: 3010 Birch Drive, Weirton, WV 26062

4B. PHYSICAL ADDRESS: Same

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE MAP AS ATTACHMENT A): From downtown Weirton, south on Rte. 2 to Freedom Way. Right on Freedom Way to Birch Drive. Right on Birch Drive approx. 1 mile. Facility is on the right side of road in Arcelor Mittal Steel complex in Half Moon Park.

5B. NEAREST ROAD:
Birch Drive

5C. NEAREST CITY OR TOWN:
Weirton

5D. COUNTY:
Brooke

5E. UTM NORTHING (KM):
4470.90

5F. UTM EASTING (KM):
531.80

5G. UTM ZONE:
17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:
John Munsch

6B. TITLE:
Prin. Env. Engineer

6C. TELEPHONE:
(303) 460-5601

6D. FAX:
(303) 265-9174

6E. E-MAIL:
jmunsch@ball.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):

009 - 00027

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH THIS PROCESS (FOR AN EXISTING FACILITY ONLY):
R30-00900027-2012, R13-2295F

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST: NO.

8A. TYPE OF EMISSION SOURCE (CHECK ONE):
 NEW SOURCE ADMINISTRATIVE UPDATE
 MODIFICATION OTHER (PLEASE EXPLAIN IN 11B)

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?
 YES NO

9. IS DEMOLITION OR PHYSICAL RENOVATION AT AN EXISTING FACILITY INVOLVED? YES NO

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:
10/15/2015

10B. DATE OF ANTICIPATED START-UP:
12/1/2015

11A. PLEASE PROVIDE A DETAILED PROCESS FLOW DIAGRAM SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS ATTACHMENT B.

11B. PLEASE PROVIDE A DETAILED PROCESS DESCRIPTION AS ATTACHMENT C.

12. PLEASE PROVIDE MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS ATTACHMENT D. FOR CHEMICAL PROCESSES, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR. NA.

13A. REGULATED AIR POLLUTANT EMISSIONS:

⇒ FOR A NEW FACILITY, PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ FOR AN EXISTING FACILITY, PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON
PM	No change in type or amount of emissions.	
PM ₁₀		
VOCs		
CO		
NO _x		
SO ₂		
Pb		
HAPs (AGGREGATE AMOUNT)		
TAPs (INDIVIDUALLY)*		
HAP (xylene/ethyl benzene)*		

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL SUPPORTING CALCULATIONS AS ATTACHMENT E. (See attached Air Flow Comparisons)

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.). **No changes to existing emissions.**

14. CERTIFICATION OF DATA

I, STEVE MARCONTELL ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A **RESPONSIBLE OFFICIAL**** (PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: 

TITLE: VICE PRESIDENT, MANUFACTURING DATE: 8 / 27 / 15

** THE DEFINITION OF THE PHRASE 'RESPONSIBLE OFFICIAL' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS

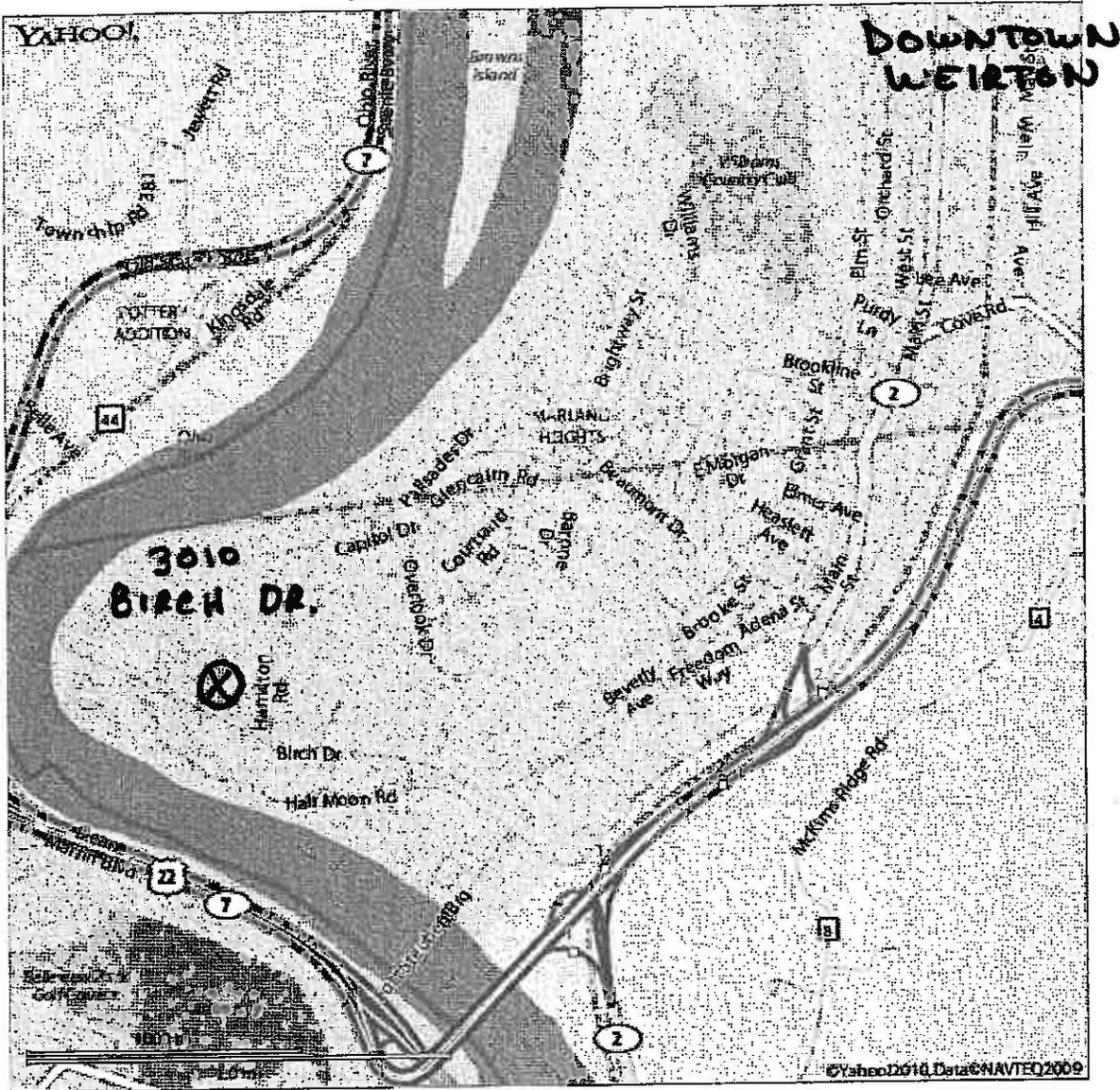
ATTACHMENT A ATTACHMENT B ATTACHMENT C ATTACHMENT D ATTACHMENT E

RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE

www.dep.wv.gov/daq

Map of Weirton, WV ATTACHMENT A-1 YAHOO!



When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

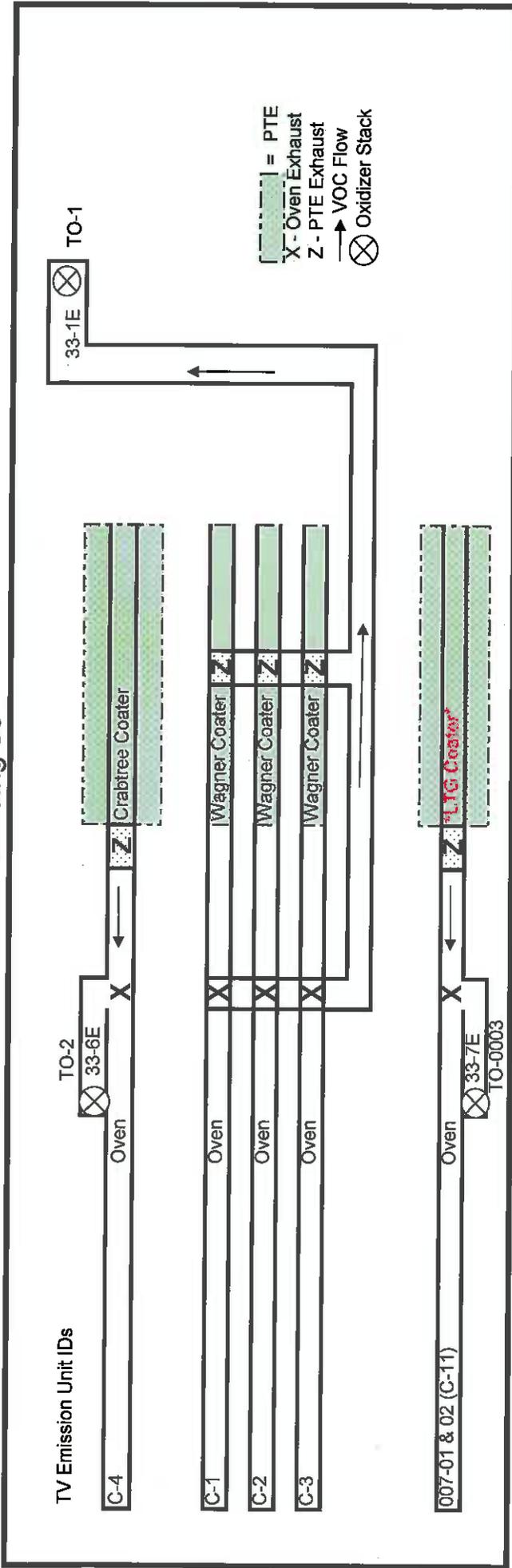
ATTACHMENT A-2



Google earth



Building 33



Attachment C

SHEET COATERS

Sheets of tin-plated steel are coated with an enamel material prior to being cut and formed into food cans or stamped into can ends. The following is a brief description of the coating process:

The first piece of equipment on a coating line is the sheet feeder. The sheet feeder holds stacks of tin-plated steel sheets and feeds them, one at a time, to the roll coater. The coater receives the plain sheets from the sheet feeder and applies a predetermined amount of enamel coating to one side the sheets. The enamel application mechanism of the coater consists of two steel rolls, mounted one above the other. The bottom roll, revolving in a pan of enamel, picks up a film of coating and transfers it to the top roll. The spacing between the two steel rolls meters the amount of enamel applied to the top roll. The top steel roll transfers the film to a pliable application roll which in turn transfers the film onto the sheet.

The coated sheets are then carried to the oven entrance where they are placed between wickets and transported through the oven. The oven evaporates the solvents in the enamel and cures the coating to a hard finish. After curing, the sheets exit the rear of the oven and are stacked uniformly on a sheet stacker. The coated sheets are then either transferred to another department to be pressed into ends, or shipped to another plant to be formed into cans.

The plant's LTG coater is the most recent coater to be installed in the facility, which consists of two separate operating units (referred to as 33 and 720) located about 200 yards apart. The LTG coater was installed in the 33 operating unit adjacent to three Wagner coaters. The drawbacks of having a dissimilar coater soon became apparent as it required a separate parts inventory, maintenance procedures and operator training. When another Wagner coater became available, due to the closure of a plant, Ball proposed replacing the LTG.

Only the coater itself will be replaced. The line's integrated oven and thermal oxidizer will remain unchanged. The Wagner coater will perform the identical function as the LTG, and there will be no change in the type or amount of emissions from the process. Like the LTG, the Wagner will be equipped with a permanent total enclosure (PTE) which captures 100% of the VOC emissions and directs them to the thermal oxidizer. The PTE will be re-evaluated by an independent contractor in accordance with EPA Method 204 to ensure it conforms to the EPA's definition of a permanent total enclosure. All monitoring and recordkeeping requirements would stay the same.