

Fact Sheet



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

Permit Number: **R30-00900014-2012**
Application Received: **May 31, 2011**
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 km Easting • 4471 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 (SIC Code 3466 and NAICS Code 332115) manufactures decorative sheets for use in the production of metal closures 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, a coating area with seven coater lines and an UV coating line, seven ovens, two incinerators, and four presses.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	14.83	5.996
Nitrogen Oxides (NO _x)	17.65	7.138
Particulate Matter (PM ₁₀)	1.34	Not reported
Total Particulate Matter (TSP)	1.34	0.542
Sulfur Dioxide (SO ₂)	0.11	0.043
Volatile Organic Compounds (VOC)	118	23.509

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Cumene	9.4	0.0136
Ethyl benzene	9.4	0.4663
Formaldehyde	0.5	0
Isophorone	9.4	0.6277
Methyl Isobutyl Ketone (MIBK)	9.4	1.2429
Naphthalene	9.4	0.2871
Phenol	9.4	0
Toluene	9.4	0.0606
Xylene	9.4	2.2091
Total	24.4	4.9073

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

Title V Program Applicability Basis

This facility has the potential to emit 118 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of Volatile Organic Compounds, Crown Cork & Seal USA, Inc. Weirton Plant 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	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permits for 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
	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 (if any)
R13-2067C	August 17, 2011	

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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

There were the following changes to the initial Title V Permit:

1. Emission Units Table 1.1 and conditions 5.1.5, 5.1.9, 5.2.2 and 5.3.3 were revised to reflect replacement of the Thermal Incinerator TO-2 on coater Line 6 with the newer unit with the same features except for better energy efficiency (LTG ECO TNV Integrated Oxidizer). The replacement is covered by recently modified permit R13-2067C. This change will not allow for an increase in production or emissions. Production will remain the same as will line speed along with all coating and film weights.
2. Emission Units Table 1.1 - added Color Hoe Press (P-3) to Line 3 (as was described in PD09-057, and thereafter covered by Permit R13-2067C).
3. Emission Units Table 1.1 - Color Hoe Press P-5 was removed from the facility and from the permit.
4. Old conditions 4.1.3 and 4.1.4 - moved to Facility - Wide Requirements section 3.1 (and re-named "3.1.10" and "3.1.11" respectively), because they set forth facility-wide emission limits (for HAPs and Formaldehyde).
5. Condition 4.4.1 – revised to include all applicable recordkeeping requirements from underlying R13-2067C permit requirement 4.4.5.
6. Condition 5.3.3 - revised to delete obsolete requirement for initial testing of oxidizer TO-1, because the test

was performed on March 5, 2007. Oxidizer TO-2 was also tested on March 29, 2007, but recently it was replaced with a new comparable combustion unit (covered by permit R13-2067C). The new oxidizer became operational on November 7, 2011, and shall be tested for initial compliance demonstration by May 7, 2012.

Oxidizer TO-2 serves Line 6 which operates with a permanent total enclosure (PTE) surrounding the coating equipment. The PTE was assessed under the tests series conducted on March 29, 2007. Per the tests results, it meets the (4) specific engineering criteria of a PTE (described in Method 204, 40CFR51, Appendix M), therefore 100% capture efficiency is assumed. No changes have been made to the physical structure of the PTE or any of the enclosed equipment since then; therefore, the capture efficiency for the new TO-2 may not be tested during the initial testing.

7. Condition 5.4.5 - added to include recordkeeping requirements for oxidizers TO-1 and TO-2 from underlying R13-2067C permit requirement 4.4.5.

Non-Applicability Determinations

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

1. **40 CFR 63, Subpart HHHHHH** (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) is not applicable to Weirton plant. The facility is a synthetic minor source of HAPs (area source), but it does not conduct paint stripping nor use MeCL, and does not use spray application. Coatings are applied by lithographic roll coating.
2. There are no Greenhouse Gas Clean Air Act requirements for this facility because this is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit.
3. From the current Fact Sheet:

45 CSR10 (August 31, 2000)	To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides: Since the oxidizer does not have the potential to emit 500 pounds per year of sulfur oxides, it is not subject to 45CSR§10-4 via 45CSR§10-4.1e. The facility does not combust any refinery or process gas streams and it does not operate a coke production facility, it is not subject to 45CSR§10-5.
45 CSR10A (January 25, 2002)	Testing, Monitoring, Recordkeeping and Reporting Requirements Under 45CSR10: since oxidizers are manufacturing process sources with the PTE for SO ₂ less than 500 lbs/yr each, they are not subject to 45CSR10A via 45CSR§10A-3.1.c.
40 C.F.R. Part 60 Subpart TT (November 1, 1982)	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 applicable to Subpart TT.
40 C.F.R. Part 63 Subpart KKKK (November 13, 2003)	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.

4. **40 C.F.R. Part 64** - The following is the list of all PSEU at the facility. They are subject to emission limitations for which permit specifies a continues compliance determination method, therefore they are exempt from the requirements of the Compliance Assurance Monitoring (CAM) rule:

PSEU	Pre-control VOCs, TPY	Control Device & Efficiency	After-control VOCs, TPY	Emission limit for VOC, TPY	Monitoring requirements
Roll Coater Lines and Oven Lines 1A & O-1A, 1B & O-1B, 2A & O-2A, 2B & O-2B, 4 and O-4	310 (each pair of a Roll Coater Line and an Oven)	TO-1 (98%)	6.16 (each)	38.2 (requirement 5.1.6)	5.2.2, 5.4.5
Roll Coater Line 3 and Oven Line O-3	370	TO-1 (98%)	7.4		
Roll Coater Line 6 and Oven Line O-6	410	TO-2 (98%)	8.2	8.33 (requirement 5.1.5)	5.2.2, 5.4.5

Based on the above information, permit shield language for CAM rule in condition 3.7.2 was revised for clarity.

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: February 10, 2012

Ending Date: March 13, 2010

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

Natalya V. Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

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Division of Air Quality
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Response to Comments (Statement of Basis)

Not applicable.