

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00900004-2012**  
Application Received: **May 14, 2012**  
Plant Identification Number: **03-54-00900004**  
Permittee: **Wheeling Corrugating Company**  
Facility Name: **Beech Bottom Plant**  
Mailing Address: **1134 Market Street**  
**Wheeling, WV 26003**

*Revised: N/A*

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Physical Location: Beech Bottom, Brooke County, West Virginia  
UTM Coordinates: 528.81 km Easting • 4,452.42 km Northing • Zone 17  
Directions: Facility is located on the west side of WV St. Rt. 2, just south of Beech Bottom

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### Facility Description

The Beech Bottom Plant manufactures coated steel coils and formed steel siding and decking products under Standard Industrial Classification (SIC) code 3479.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Carbon Monoxide (CO)	43.99	3.3
Nitrogen Oxides (NO <sub>x</sub> )	100.76	4.20
Particulate Matter (PM <sub>10</sub> )	16.53	1.09
Total Particulate Matter (TSP)	17.20	2.20
Sulfur Dioxide (SO <sub>2</sub> )	0.47	0.02
Volatile Organic Compounds (VOC)	99.43	19.18

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Formaldehyde	0.47	0.02
Hexane Isomers	0.008	0.00
Isophorone	2.93	0.00
Ethylbenzene	1.94	0.24
Hexane	1.46	0.00
Xylene	6.51	0.42
Napthalene	2.07	0.44
Cumene	0.37	0.0057
HAPs from CCL #2	4.13	- <sup>1</sup>
Total HAPs	19.89	1.13

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

<sup>1</sup>*Included in the Total HAPs for 2010 Actual Emissions.*

### Title V Program Applicability Basis

This facility has the potential to emit 100.76 TPY of NO<sub>x</sub>. Due to this facility's potential to emit 100 tons per year of criteria pollutant, Wheeling Corrugating Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

If the facility did not emit 100 tons per year of a criteria pollutant, it would still be required to have a Title V permit under 45CSR§30-3.1.a.3. The facility is subject to 40 C.F.R. 63, Subpart SSSS and was a major source of HAPs before the effective date of this subpart.

### 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:	45CSR2 45CSR6 45CSR7 45CSR10 45CSR11 45CSR13 45CSR16	Indirect Heat Exchangers Open burning prohibited. Particulate Matter Emissions Emission of Sulfur Oxides Standby plans for emergency episodes. NSR permits. Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30 45CSR34	Operating permit requirement. Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 60, Subpart TT 40 C.F.R. Part 61 40 C.F.R. Part 63, Subpart SSSS 40 C.F.R. Part 82, Subpart F	Metal Coil Surface Coating Asbestos inspection and removal Surface Coating of Metal Coil MACT 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> )
R13-2379C	3/15/2005	

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**

With this permit renewal, the following two corrections/clarifications have been made to the emission units table:

- The first correction involved the number of stacks associated with the ventilation system for the seven-stage cleaning section (surface treatment) for Coil Coating Line #2 (CCL#2). The previous

permit said only one emission point was associated with it, but there are two emission points, Stacks P15 and P18. The design capacity was revised to include each exhaust fan.

- The second correction was to add an exhaust fan rated at 6500 acfm for the CCL#2 drying oven.

Condition 5.2.6 was added to demonstrate compliance with Condition 5.1.16, which requires the coater rooms to achieve 100% capture efficiency. This is the same monitoring required to demonstrate compliance with the same condition for Coating Line #2 specified in Conditions 6.1.12 and 6.2.5.

Condition 5.4.4 has been corrected to reference Emission Point 11E.

There have been no equipment changes made at this facility since the issuance of the previous Title V permit, R30-00900004-2007. The only additional changes made with this permit renewal are formatting and boilerplate changes.

**Greenhouse Gas Tailoring Rule:** This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

### **Non-Applicability Determinations**

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

- a. 45CSR17 – This rule does not apply, as stated in 45CSR§17-6.1. Sources that are subject to the fugitive particulate matter emission requirements of 45CSR7 are exempt from 45CSR17.
- b. 45CSR21 – This rule is not applicable because the facility is not located in any of the affected counties.
- c. 45CSR27 – This rule does not apply because this facility does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.
- d. 45CSR29 – This rule is not applicable because the facility is not located in any of the affected areas specified in the regulation.
- e. 40 C.F.R. Part 63, Subpart DDDDD Boiler MACT – The facility is not a major source of HAPs, therefore this subpart does not apply.
- f. 40 C.F.R. Part 68 Risk Management Plan – This regulation is not applicable because none of the storage thresholds are triggered.
- g. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) - This facility does not have pollutant specific emissions units that have potential pre-control device emissions greater than major source thresholds, and therefore is not subject to Compliance Assurance Monitoring.

### **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: August 24, 2012  
Ending Date: September 24, 2012

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

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.