

Fact Sheet



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

Permit Number: **R30-00900014-2006**
Application Received: **September 18, 2006**
Plant Identification Number: **03-54-009-00014**
Permittee: **CROWN CORK & SEAL USA, INC.**
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 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, and two incinerators, and three presses.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	14.83	5.8
Nitrogen Oxides (NO _x)	17.65	6.982
Particulate Matter (PM ₁₀)	1.34	0.531
Total Particulate Matter (TSP)	NA	NA
Sulfur Dioxide (SO ₂)	0.11	0.043
Volatile Organic Compounds (VOC)	118 ⁽¹⁾	442.6997 ⁽¹⁾
Lead (Pb)	NA	NA
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2005 Actual Emissions
Cumene		0.0002 ⁽¹⁾
Ethyl benzene		7.95 ⁽¹⁾
Formaldehyde		0.69 ⁽¹⁾
Isophorone		16.82 ⁽¹⁾
Methyl Isobutyl Ketone (MIBK)		23.46 ⁽¹⁾
Naphthalene		5.94 ⁽¹⁾
Phenol		0.025 ⁽¹⁾
Toluene		0.55 ⁽¹⁾
Xylene		45.61 ⁽¹⁾
Total	24.4 ⁽¹⁾	101.0452 ⁽¹⁾
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

⁽¹⁾ The permittee is installing permanent total enclosures on all 6 sheet-coating lines and also installing an additional RTO per R13-2067B. This in turn will substantially reduce the VOC & HAP emissions. All emissions will be going through the RTOs with 100% capture and 98% control on all lines causing a drastic reduction on all emissions and thus the difference between 2005 Actual and the Potential Emission stated.

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	New Source Review permits for stationary 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 draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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, 45CSR15, 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>)
R30-00900014-1995	April 16, 2002	R13-2067A Issued: December 28, 2004 Install an additional sheet coating line.
R13-2067B Install New After Burner Modify the R13 permits to become a minor source under 40 C.F.R. Part 63 Subpart KKKK Supersedes R13-2067A and Replaces R13-0672	August 3, 2006	

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

The following changes to the April 16, 2002 Title V Permit and Fact Sheet were permits R13-2067A and R13-2067B. These changes are:

1. R13-2067A was for the installation of roll coating Line 6 and an oven that were installed in 2005.

2. R13-2067B Permit request is to install a new after burner and for the facility to become a synthetic minor under 40 C.F.R. 63 Subpart KKKK. R13-2067B supersedes and replaces R13-2067A and R13-0672.

R13-2067B Permit

Section 4.1.7.

“Facility-wide emissions to the atmosphere of Hazardous Air Pollutants (HAPs), with the exception of Formaldehyde (CAS 50-00-0), shall not exceed 9.4 tons per year of any single HAP or 24.4 tons per year of any combination of HAPs.”

The statement “with the exception of Formaldehyde” may imply that the total HAPs be year could exceed the limit of 24.4 tons per year.

To avoid any misunderstanding, Section 4.1.3 in the Title V Permit reads:

Facility-wide emissions to the atmosphere of Hazardous Air Pollutants (HAPs), with the exception of Formaldehyde (Section 4.1.4.), shall not exceed 9.4 tons per year, of any single HAP or 24.4 tons per year of any combination of HAPs (Formaldehyde is included in the single and combination of HAP emissions).

Section 4.1.8.

“The following HAPs were identified as potential material constituents of the surface coatings/thinners utilized by the facility:”

This statement was omitted from the Title V Permit, Section 4.1.4, since there were no HAPs listed in Section 4.1.8 of the R13-2067B Permit.

Section 4.1.14.

There was a typo in the first and third sentence of this section. Instead of Oven Line 2B (O2B), it should be Oven Line 1B (O-1B).

This was revised in the Title V Permit, Section 4.1.6, in two places to read Oven Line 1B (O-1B).

45CSR6

45CSR§6-4.1 requires the permittee to demonstrate compliance with the following allowable particulate matter emissions rates from the following formula:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

Where, the factor, F, is as indicated in Table I below:

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions

Incinerator Capacity	Factor F
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

$$\text{(TO-1) Emission (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)} = 5.43 \times 450 \text{ (lb/hr)/}2000 \text{ (lb/ton)} = 1.2 \text{ lb allowable PM/hr}$$

$$\text{(TO-2) Emission (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)} = 5.43 \times 168 \text{ (lb/hr)/}2000 \text{ (lb/ton)} = 0.46 \text{ lb allowable PM/hr}$$

45CSR27

Even though the facility emits formaldehyde, the emission rate of approximately 100 pounds per year is well under the 45CSR27 limit of 1000 pounds per year. Since the facility formaldehyde emissions are less than 1000 pounds per year, BAT is not required. The facility will demonstrate they are not subject to the requirements of this rule by maintaining records of coating usage/solvent usage containing formaldehyde onsite based on 12 month rolling totals.

Non-Applicability Determinations

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

<p>45 CSR10 (August 31, 2000)</p>	<p>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.</p>
<p>45 CSR10A (January 25, 2002)</p>	<p>Testing, Monitoring, Recordkeeping and Reporting Requirements Under 45CSR10: Since the oxidizer combust natural gas, it is not subject to 45CSR10A via 45CSR§10A-3.1.b.</p>
<p>40 C.F.R. Part 60 Subpart TT (November 1, 1982)</p>	<p>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.</p>
<p>40 C.F.R. Part 63 Subpart KKKK (November 13, 2003)</p>	<p>National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans - The Crown Cork & Seal USA's Weirton Plant is reducing their HAP emission limitations (per permit R13-2067B) by installing permanent total enclosures to capture 100% of the VOC and a regenerative thermal oxidizer to destroy 98% of the VOC from coating lines C-1A, C-1B, C-2A, C-2B, C-3, C-4, and C-5 to become a synthetic minor source under this subpart.</p>
<p>40 C.F.R. Part 64 (10/22/1997)</p>	<p>There are no pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the "major" threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.</p>

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 20, 2006
Ending Date: November 20, 2006

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

Wayne Green
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

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.