

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 3, 2012.

Permit Number: **R30-00900012-2012**
Application Received: **June 8, 2015**
Plant Identification Number: **03-54-009-00012**
Permittee: **Ardagh Metal Packaging USA Inc.**
Mailing Address: **3030 Birch Drive, Weirton, WV 26062**
Permit Action Number: *MM01* Revised: *November 13, 2015*

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 531.834 km Easting • 4470.823 km Northing • Zone 17
Directions: Located at Half Moon Industrial Park – US Route 22 to Half Moon Road
to Signode Road.

Facility Description

Ardagh Metal Packaging USA Inc. (Weirton Plant) manufactures metal packing for the food and pet food industry and has a SIC Code 3411 and a NAICS Code 332431. The Weirton Plant has four (4) coating lines with three thermal oxidation systems with heat recovery. The operating lines (Line Nos. 1 through 4) include the coating operation, drying operation, and the emission control. The equipment is fed uncoated sheets of metal, applies the coating, dries the coating, and restacks the sheets. The only difference with the lines is that Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied in the coating portion of the operation. The facility receives rolls of sheet metal, cuts the sheets, prints and coats the sheets, dries the coatings and then restacks the sheets. The coated sheets are the final product. The site also makes can ends from the sheet metal. 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 four sheet coaters, four ovens, and three incinerators, and an end press area with six end stampers.

This modification is for an increase in VOC emission limits from emission units 15S, 16S, and 30S (tanks), decrease in the minimum combustion chamber operating temperature for oxidizer 3C, addition of new

coatings and solvents to be used at the facility, and the addition of previously approved surface coating HAPs.

Emissions Summary

The change in Potential Emissions due to this modification are as follows:

Pollutant	Change in Potential (+ or -), TPY
VOC	+0.27

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 142.02 tons of VOC per year. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Ardagh Metal Packaging USA Inc. 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants
	45CSR30	Operating permit requirement.

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>)
R13-2410D	July 27, 2015	

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

The following changes were made during this modification to reflect changes made in R13-2410D:

- In condition 4.1.1 the products being stored in tanks #1(15S) and #2 (16S) were updated along with the VOC emission limits (lb/year) for the new stored products. Added a note to the bottom of the table stating: “The above table is a snapshot of coating storage at permit approval time. The permittee is allowed to change coating storage as long as the requirements given in sections 4.1.8, 4.1.9, and 4.1.10 of this permit are met.”
- Updated the table of permitted coatings and solvents in condition 4.1.7.
- Updated the table in 4.1.8. and added a note at the bottom of the table.
- Updated the tons/year emission limit of VOC for tanks (15S, 16S, 30S) in the condition 4.1.9 table.
- Updated the date of the last capture and destruction efficiency test in condition 4.3.2.
- Updated the minimum combustion chamber operating temperature for coating Line 4 (18S) and Thermal Oxidizer No. 3 (3C) in the condition 5.1.3 table.
- Updated the minimum temperature for Thermal Oxidizer No. 3 (3C) in conditions 5.2.5 and 5.9.

Non-Applicability Determinations

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

None.

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: Not Applicable for minor modifications.

Ending Date: N/A

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
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
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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.