

Fact Sheet



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

Permit Number: **R30-00900054-2008**
Application Received: **December 20, 2007**
Plant Identification Number: **03-54-009-00054**
Permittee: **Roll Coater, Inc.**
Facility Name: **Weirton**
Mailing Address: **4502 Freedom Way, Weirton, WV 26062**

Physical Location: Weirton, Brooke County, West Virginia
UTM Coordinates: 534.83 km Easting • 4474.18 km Northing • Zone 17
Directions: From Wheeling, WV take I-70 to Ohio State Route 7. Go north on Ohio State Route 7 to the Weirton Exit at Steubenville. Then cross over the Fort Steuben Bridge to Weirton, WV. The Fort Steuben Bridge becomes Freedom Way. The facility is on the right.

Facility Description

Roll Coater's Weirton facility is a metal coil coating facility with a maximum capacity of 158,231.5 pounds of metal coil coated per hour. The metal coil coating facility has a SIC code of 3479 and NAICS code of 332812. Metal coils delivered to the facility are run through the preclean section to remove oil from the surface of the strip. The strip then passes through the wet section for cleaning, rinsing, and chemical treatment. Then the metal strip passes through the coater room where primer is applied, and on through the primer oven to the quench/cooling area. From the quench/cooling area, the metal strips return to the coater room where a top coat is applied. From the finish coater the metal strip passes through the finish oven to the quench/cooling area. The prime and finish ovens exhaust to the afterburner (thermal oxidizer) and the waste heat is drawn through the waste heat boiler to generate steam for heating the wet section tanks. When steam is not required, the exhaust is directed through the bypass stack. Finished coils are packaged and shipped to other locations for further processing. An onsite wastewater treatment system is operated to treat process wastewater from coil cleaning, rinsing, chemical treatment, and quenching.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2006 Actual Emissions
Carbon Monoxide (CO)	61.3	4.03
Nitrogen Oxides (NO _x)	68.3	16.10
Particulate Matter (PM ₅)	27.1	24.19
Particulate Matter (PM ₁₀)	27.1	24.19
Total Particulate Matter (TSP)	27.1	24.19
Sulfur Dioxide (SO ₂)	2.08	0.67
Volatile Organic Compounds (VOC)	15,270	62.87
Lead (Pb)	0	0
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
Chromium Compounds	0.07	0.01
Cumene	25.21	0.08
Dimethyl Formamide	377.81	0.004
Dimethyl Phthalate	83.90	0.07
Ethyl Benzene	109.53	0.23
Formaldehyde	0.44	0.07
Glycol Ethers	350.26	0
Hydrogen Chloride	0.17	0
Hydrogen Fluoride	0.50	0.05
Isophorone	737.94	0.69
MIBK	73.96	0.21
Naphthalene	279.56	1.66
Toluene	194.97	0.16
Xylene	259.71	1.88
<i>Some of the above HAPs may be counted as PM or VOCs</i>		
Regulated Pollutants other than Criteria and HAPs	Potential Emissions	2006 Actual Emissions
Nitric Acid	0.25	0
Phosphoric Acid	0.71	0

Title V Program Applicability Basis

This facility has the potential to emit over 15,270 tons per year of volatile organic compounds, 25.21 tons per year of Cumene, 377.81 tons per year of Dimethyl Formamide, 83.90 tons per year of Dimethyl Phthalate, 109.53 tons per year of Ethyl Benzene, 737.94 tons per year of Isophorone, 73.96 tons per year of MIBK, 279.56 tons per year of Naphthalene, 194.97 tons per year of toluene, 259.71 tons per year of xylene and an aggregate amount of HAPs of 2,494.03 tons per year. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Roll Coater, 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Control of particulate matter from manufacturing processes.
	45CSR10	To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	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	Asbestos inspection and removal
	40 C.F.R. 63, Subpart SSSS	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR6	Open burning prohibited.

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>)
R13-1910B	October 26, 2006	
Supersedes R13-1910A		
Administrative update to reorganize Section 4 of R13- 1910A.		

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 no additional changes to the February 5, 2003 Title V Permit and Fact Sheet since R30-00900054-2003 (MM02) was issued.

The following updates were made in the renewal.

1. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
2. Updated the facility information and regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
3. Removed Section 3.5.10 since the compliance dates for 40 C.F.R. Part 63 Subpart SSSS have passed.
4. The initial Title V testing requirements in Sections 4.3.1.a, 5.3.1, 6.3.1, and 6.3.2 were removed since the testing was done in August 2004. Roll Coater, Inc. is required to test per these sections after each Title V permit renewal is issued.
5. Since the afterburner (thermal oxidizer) is an incinerator, it is subject to 45CSR6 [see Sections 6.1.13 through 6.1.18.]. These sections were not included in the initial Title V permit.
6. Revised the citation in Section 6.5.1 from [40 C.F.R. § 60.48c., Subpart Dc] to [45CSR§30-5.1.c.] since the waste heat boiler is not subject to 40 C.F.R. Part 60 Subpart Dc.
7. Relocated the recordkeeping requirements that are in the Testing Requirements Section to the Recordkeeping Requirements Section that is Section 8.3.1 to Section 8.4.1. Revised Section 8.3.1 requirements with reserved.
8. The SO₂ from the waste treatment unit vents to atmosphere and not to any duct work, piping, stack or control equipment exhaust. Thus, Section 7.1.2 that references 45CSR§10-4.1 was removed.
9. 40 C.F.R. Part 63 Subpart SSSS requirements were added in Section 9.0.

40 C.F.R. Part 63 Subpart SSSS - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

The Initial Title V Permit required Roll Coater, Inc. to:

1. Submit an initial notification by June 10, 2004 (June 10, 2002 plus 2-years) (40 C.F.R. § 63.5180 (b) (1)). Roll Coater submitted a Part 1 Title V Application for Sources Subject to Section 112(j) Provisions (MACT Hammer). The initial notification (40 C.F.R. § 63.9 (b)) was submitted on May 10, 2002. Thus, filling their obligation according to 40 C.F.R. § 63.5180 (b) (3).
2. Comply with all applicable requirements of 40 C.F.R. Part 63, Subpart SSSS by June 10, 2005 (40 C.F.R. § 63.5130 (a)). Roll Coater complied on June 10, 2005.
3. Submit a complete application for a significant Title V permit modification to include the specific requirements of 40 C.F.R. Part 63 Subpart SSSS in the operating permit on or prior to January 10, 2006. On January 10, 2006, the DAQ's Compliance and Enforcement (CE) Section informed the Roll Coater's consultant that the CE Section did not see any reason for them to submit an update to the Title V permit until the pending monitoring determinations were resolved. DAQ granted Roll Coater, Inc. request for wavier of 40 C.F.R. Part 63 Subpart SSSS Performance Test on April 26, 2006.

Roll Coater, Inc. selected Option Number 4 of the four available options in Table 1 of 40 C.F.R. § 63.5170. Compliance is demonstrated by using a combination of compliant coatings with a control device to maintain an acceptable equivalent emission rate that does not exceed 0.046kg HAP per liter solids (40 C.F.R. § 63.5120 (a) (2)) on a rolling 12-month average as applied basis that will be determined monthly.

EPA Region 3 determined that Roll Coater must monitor pressure drop for the downstairs and upstairs coating rooms. These pressure drops will ensure that the capture efficiency is maintained. The downstairs and upstairs coating rooms pressure drops, afterburner temperature and the overall control efficiency of 95.5% were determined by the August 8-11, 2004 testing. According to Roll Coater monitoring plan that is based on the August 8-11, 2004 compliance demonstration performance testing, they will demonstrate continuous compliance by the 3-hour block average of these critical parameters in 15-minute recorded intervals.

40 C.F.R. Part 63 Subpart SSSS requires Roll Coater to maintain a monitoring plan and start-up, shutdown, and malfunction plan at the Weirton facility.

Non-Applicability Determinations

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

45CSR2	<i>To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.</i> Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 45CSR2.
45CSR21	<i>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.</i> 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. Since the Roll Coater's facility is located in Brooke County, this facility is not subject to 45CSR21.
45CSR27	<i>To Prevent and Control the Emissions of Toxic Air Pollutants.</i> Potential formaldehyde emissions (0.44 tpy or 880 lbs/yr) from the Roll Coater facility are below the applicability threshold of 1000 pounds per year. Therefore, Roll Coater is exempted from 45CSR27.
45CSR29	<i>Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.</i> 45CSR29 does not apply to this facility since it is located in Brooke County.
40 C.F.R. 60 Subpart Dc	<i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.</i> Since the heat input to the waste heat boiler is not from combustion of fuel in a steam generating unit, the waste heat boiler is not subject to 40 C.F.R. Part 60 Subpart Dc.
40 C.F.R. 63 Subpart JJJJ	<i>Paper and Other Web Coating.</i> This MACT covers coil coating lines on which 85 percent or more of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick. Roll Coater's Weirton facility coats only metal coil that is greater than 0.006 inches thick.
40 C.F.R. Part 64	The Roll Coater's Pollutant Specific Emission Units, Prime and Finish Ovens, are not subject to the Compliance Assurance Monitoring (CAM) rule because they are subject to 40 C.F.R. Part 63 Subpart SSSS that was proposed after November 11, 1990.

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: July 11, 2008
 Ending Date: August 11, 2008

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)

The following revisions were made to the Draft/Proposed permit per Roll Coater, Inc request:

1. Because of typo, there were two 3.1.11 conditions. The first condition was revised as Section 3.1.9. The second condition was revised to read as 3.1.10 since the previous Section 3.1.10 was relocated as Section 5.5.3 (see item 2).
2. Section 3.1.10 was relocated to Section 5.5.3 since this condition is a Source Specific Requirement for metal coil surface operation and not a Facility-Wide Requirement.
3. Because of repetition, the second Section for 3.4.2 was removed.
4. The phrase “of 1498 °F” in Section 9.1.9 was removed since “1498 °F” is contained in Section 9.1.5, and Section 9.1.9 refers to 9.1.5.