

Fact Sheet



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

Permit Number: **R30-00900004-2007**
Application Received: **June 8, 2007**
Plant Identification Number: **03-54-00900004**
Permittee: **Wheeling Corrugating Company**
Facility Name: **Beech Bottom Plant**
Mailing Address: 1134 Market Street
Wheeling, WV 26003

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

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

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2006 Actual Emissions
Carbon Monoxide (CO)	42.5	14.8
Nitrogen Oxides (NO _x)	98.9	18.7
Particulate Matter (PM ₁₀)	16.5	3.3
Total Particulate Matter (TSP)	17.1	3.5

Sulfur Dioxide (SO ₂)	0.5	0.1
Volatile Organic Compounds (VOC)	99.3	4.4
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
HAP's	19.9	4.4
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

During the first significant compliance date for 40CFR63 Subpart SSSS, this facility had the potential to emit over 429 tons per year of VOC's, 10 tons per year of a single HAP, and 25 tons per year of total HAP's. Due to this facility's being subject to 40CFR63, Subpart SSSS and therefore defined as an area source from 45CSR§30-3.1.a.3, Wheeling Corrugating Company Beech Bottom 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:	45CSR2	Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter Emissions
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	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 60 TT	Metal Coil Surface Coating
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 SSSS	Surface Coating of Metal Coil MACT
	40 C.F.R. Part 63 DDDDD	Boilers and Process Heaters MACT
	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>)
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.

The following are the changes and/or additions to the Title V Permit since it was most recently issued.

A significant modification was received for this facility on May 18, 2006. These changes and/or additions for the significant modification were incorporated into this Title V renewal.

Determinations and Justifications

Boilers

- 40CFR63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*
The Beech Bottom Plant has four 25.2 MMBTU/hr natural gas boilers that are subject to this MACT. For existing natural gas boilers, the only requirement for this MACT is initial notification. The facility has already provided the initial notification, so there are no more requirements from this MACT. This MACT was vacated on July 30, 2007.

Coating Line #1

- 45CSR13 – *Permits for Construction*
Condition 5.1.11 establishes limits for criteria pollutants, as well as HAP's for the regenerative thermal oxidizer (3C). These emissions are based upon the control devices capture efficiency and destruction efficiency. The 100% capture and 98% destruction are required by Conditions 5.1.16 and 5.1.12. They are also based on using natural gas as fuel (and in limited amounts) for the regenerative thermal oxidizer. This is given in Condition 5.1.13 and 5.1.14.

2. 40CFR60, Subpart TT - *Standards of Performance for Metal Coil Surface Coating*
The Beech Bottom Plant is subject to this NSPS. The emission limitations of 0.14 kg VOC/l of coating solids and 90% VOC reduction are given in Condition 5.1.9. The 98% destruction efficiency is given in Condition 5.1.12. The testing requirements are given in Condition 5.3.1. The recordkeeping requirements are given in Condition 5.4.3. The reporting requirements are given in Condition 5.5.1 and 5.5.3.
3. 40CFR63, Subpart SSSS - *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil*
The Beech Bottom Plant is subject to this MACT. The emission limitations of 98% VOC emission reduction as well as mass and concentration limitations are given in Condition 5.1.10. The monitoring requirements are given in Conditions 5.2.3, 5.2.4, and 5.2.5. The testing requirements are given in Condition 5.3.2. The recordkeeping requirements are given in Condition 5.4.4. The reporting requirements are given in Condition 5.5.2.

Coating Line #2

1. 45CSR13 – *Permits for Construction*
Condition 6.1.8 establishes limits for criteria pollutants, as well as HAP's for the thermal oxidizer (CO3). These emissions are based upon the control devices capture efficiency and destruction efficiency. The 100% capture and 98% destruction are required by Conditions 6.1.13 and 6.1.7. They are also based on using natural gas as fuel (and in limited amounts) for the thermal oxidizer. This is given in Condition 6.1.7 and 6.1.10.
2. 40CFR60, Subpart TT - *Standards of Performance for Metal Coil Surface Coating*
The Beech Bottom Plant is subject to this NSPS. The emission limitations of 0.14 kg VOC/l of coating solids and 90% VOC reduction are given in Condition 6.1.18. The 98% destruction efficiency is given in Condition 6.1.11. The testing requirements are given in Condition 6.3.1. The recordkeeping requirements are given in Condition 6.4.2. The reporting requirements are given in Condition 6.5.1 and 6.5.3.
3. 40CFR63, Subpart SSSS - *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil*
The Beech Bottom Plant is subject to this MACT. The emission limitations of 98% VOC emission reduction as well as mass and concentration limitations are given in Condition 6.1.16. The monitoring requirements are given in Conditions 6.2.3, 6.2.4, and 6.2.6. The testing requirements are given in Condition 6.3.2. The recordkeeping requirements are given in Condition 6.4.3. The reporting requirements are given in Condition 6.5.2.

Non-Applicability Determinations

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

1. 45CSR21 – This rule is not applicable because the facility is not located in any of the affected counties.
2. 45CSR27 – This rule does not apply because this facility does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.
3. 45CSR29 – This rule is not applicable because the facility is not located in any of the affected areas specified in the regulation.
4. 40CFR Part 68 Risk Management Plan – This regulation is not applicable because none of the storage thresholds are triggered.
5. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) - This facility does not have pollutant specific emissions units that have a pre-control 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: September 28, 2007
Ending Date: October 29, 2007

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

Mike Egnor
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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.