

STATEMENT OF BASIS
ITW SEXTON
Facility No. 712-0019
Decatur, Alabama

On July 7, 2021, ITW Sexton submitted their fourth renewal Title V - Major Source Operating Permit (MSOP) application for review. This facility's MSOP was last renewed on January 16, 2017.

There are no current or ongoing enforcement actions against ITW Sexton necessitating additional requirements to achieve compliance with permit conditions. Morgan County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS).

OPERATION:

ITW Sexton manufactures metal cans used in the aerosol and automotive industries. Their SIC code is 3411 for the manufacturing of metal/steel containers, and the facility operates approximately 7,488 hours annually. ITW Sexton's operations produce two-piece cans and two-piece threaded cone-top cans utilizing the drawn and deep drawn processes. Tin plate steel is processed through mechanical presses to form the cans. The formed cans are then washed and rinsed to remove oils and any other foreign material. The cans are then dried using a forced air drier.

Cans Coating Lines 1 – 6 Operations:

Paint Lines 1 – 4: Baking enamel is applied to the cans using an electrostatic disk and the coated cans are cured in a natural gas-fired oven. The cans are sent through an off-set printer for letter printing and application of clear over-
varnish using a roller coating application. The cans are then cured in a natural gas-fired oven. Once the cans are cured, the bottoms are installed and pressure-tested before being packaged for shipping.

Paint Line 5: This line's process operations are similar to Lines 1 – 4 with the exception of an ITW BGK Infrared Oven to cure the paint instead of using a natural gas-fired oven. The cans are then baked a second time in a natural gas-fired oven.

Paint Line 6: This Line only goes through a two-step process; where baking enamel is applied to the cans with an electrostatic disk and cured in an electric infrared oven. No printings on these cans are required.

Lines' Capabilities:

Paint lines 1, 2, and 6 have the capability of processing and coating 80 cans per minute (CPM), while Paint Lines 3, 4, and 5 have the capability of 120 CPM each. The paint lines capabilities are used in the calculating of their material usage and emissions emitted.

EMISSIONS / REQUIREMENT:

The volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) are emitted from the materials used in their operations such as the coatings, inks, varnishes, and cleanup solvents. These regulated criteria air contaminants are emitted to the atmosphere by the surface coating operations of the metal cans. The HAPs are listed in Appendix G of the ADEM Air Regulations.

Pollutants	Potential tpy	Actual tpy
VOCs	199.2	95.0
HAP	9.5	0.45
HAPs	20.0	4.0
PM	12.3	4.3

Their potential emissions of VOCs exceeds the threshold of 100 tons per year. Therefore, ITW Sexton is considered a major source for Title V. This facility has requested to maintain their current VOC emissions limit of 200 tpy. The facility is considered a minor source for PSD due to their potential VOC emissions being less than 250 tpy. The facility wide HAP emissions will be restricted to 9.5 tons for any single HAP and 24.5 tons for any combination of HAPs during any consecutive 12-month period. These HAP limits keep the facility from being subject to NESHAP 40 CFR Part 63 Subpart KKKK and Subpart MMMM for Surface Coating of Metal Cans and Miscellaneous Metal Parts and Productions, respectively. No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

There are no Control Technology Guidelines (CTG) or New Source Performance Standard (NSPS) regulations applicable to this facility. Their Greenhouse Gases (GHG) emissions from the facility's natural gas fired ovens [six 1.0 MMBtu/hr paint, and six 0.75 MMBtu/hr varnish] are 4,559.1 tons of CO₂ and 4,599.2 tons CO_{2e}.

Monitoring of Emissions

The VOC and HAP emissions would be determined from their material usage and reported quarterly to the Department. There are no applicable CAM requirements for this facility's operations. Their existing monitoring is sufficient to demonstrate compliance with all applicable permit limits and regulations; therefore, no changes are necessary. Currently, there are no NESHAP or NSPS requirements applicable to this facility.

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this major source operating permit will be sent to all affected states bordering Alabama.

Environmental Justice

ADEM utilized EPA's EJSCREEN screening tool to help identify areas that may warrant additional consideration, analysis, or outreach (see attached EJSCREEN Report).

RECOMMENDATION:

Based on the above analysis, I recommend that ITW Sexton's current MSOP be renewed pending the 30-day public e-Notice period and EPA's 45-day review. This Title V Renewal Permit will be assigned Unit No. 001 with all of the current Permit requirements.

Permit Unit No.	Description of Unit
001	Lines 1-6 Manufacturing and Surface Coating of Metal Cans with Associated Equipment

Clarence Fairer III
Chemical Branch
Air Division

October 13, 2021
Date