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033-00198

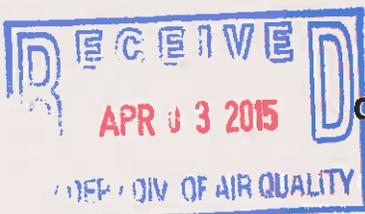
March 2015
Project No. 15-158

**REGULATION 13 PERMIT CLASS II
ADMINISTRATIVE UPDATE
APPLICATION R13-2880**

**OPERATE A NATURAL GAS FIRED
ANNEALING FURNACE**

**SKANA ALUMINUM COMPANY
Wilsonburg, West Virginia
Facility ID 033-00198**

PREPARED BY:



**MSES Consultants, Inc.
P.O. Drawer 190
Clarksburg, West Virginia 26302-0190
(304) 624-9700**

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Skana Aluminum Company		2. Federal Employer ID No. (FEIN):	
3. Name of facility (if different from above): Same		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: 345 Wilsonburg Road Clarksburg, WV 26301		5B. Facility's present physical address: Same	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO ⇒ If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . ⇒ If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO ⇒ If YES, please explain: Applicant owns the facility ⇒ If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Aluminum rolling mill		10. North American Industry Classification System (NAICS) code for the facility: 331319	
11A. DAQ Plant ID No. (for existing facilities only): 0 3 3 - 0 0 1 9 8		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2880	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

<p>12A.</p> <p>⇒ For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road;</p> <p>⇒ For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B.</p> <p>From Clarksburg take US Route 50 West. Exit at Wilsonburg. Turn right at the stop sign. Turn left immediately into the facility.</p>		
<p>12.B. New site address (if applicable):</p> <p>Not Applicable</p>	<p>12C. Nearest city or town:</p> <p>Wilsonburg</p>	<p>12D. County:</p> <p>Harrison</p>
<p>12.E. UTM Northing (KM): 4,348.5</p>	<p>12F. UTM Easting (KM): 552.6</p>	<p>12G. UTM Zone: 17</p>
<p>13. Briefly describe the proposed change(s) at the facility:</p> <p>Operate a previously decommissioned annealing furnace.</p>		
<p>14A. Provide the date of anticipated installation or change: / /</p> <p>⇒ If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: 01/02/2013</p>		<p>14B. Date of anticipated Start-Up if a permit is granted:</p> <p>Immediately Upon Approval</p>
<p>14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).</p>		
<p>15. Provide maximum projected Operating Schedule of activity/activities outlined in this application:</p> <p style="text-align: center;">Hours Per Day 24 Days Per Week 7 Weeks Per Year 52</p>		
<p>16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		
<p>17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III.</p>		
<p>18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D.</p>		
<p>Section II. Additional attachments and supporting documents.</p>		
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).</p>		
<p>20. Include a Table of Contents as the first page of your application package.</p>		
<p>21. Provide a Plot Plan, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance).</p> <p>⇒ Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).</p>		
<p>22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F.</p>		
<p>23. Provide a Process Description as Attachment G.</p> <p>⇒ Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).</p>		
<p>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</p>		

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.

⇒ For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- | | | |
|--|---|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions | <input type="checkbox"/> Quarry |
| <input type="checkbox"/> Chemical Processes | <input type="checkbox"/> Hot Mix Asphalt Plant | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant | <input type="checkbox"/> Incinerator | <input type="checkbox"/> Storage Tanks |
| <input type="checkbox"/> Grey Iron and Steel Foundry | <input checked="" type="checkbox"/> Indirect Heat Exchanger | |
| <input type="checkbox"/> General Emission Unit, specify | | |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- | | | |
|--|---|--|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse | <input type="checkbox"/> Flare |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser | <input type="checkbox"/> Mechanical Collector |
| <input type="checkbox"/> Afterburner | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |
| <input type="checkbox"/> Other Collectors, specify | | |

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

➤ If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- | | |
|--|---|
| <input type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership |
| <input type="checkbox"/> Authority of Governmental Agency | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE Steven Gallimore DATE: 4/1/15
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Steven Gallimore 35C. Title: Director of Operations

35D. E-mail: steve.gallimore@skanaaluminum.com 36E. Phone: 920-946-7763 36F. FAX:

36A. Printed name of contact person (if different from above): Mary K. Eggett 36B. Title: HR / Office Administrator

36C. E-mail: mary.eggett@skanaaluminum.com 36D. Phone: 304-423-5573 36E. FAX: 304-423-5564

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input checked="" type="checkbox"/> Attachment B: Map(s) | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input type="checkbox"/> Attachment D: Regulatory Discussion | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input type="checkbox"/> Attachment E: Plot Plan | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input checked="" type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table | <input type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY - IF THIS IS A TITLE V SOURCE:

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
 - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
 - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
 - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
 - NSR permit writer should notify a Title V permit writer of draft permit,
 - Public notice should reference both 45CSR13 and Title V permits,
 - EPA has 45 day review period of a draft permit.

ATTACHMENT A
Business Certificate

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
SKANA ALUMINUM COMPANY
345 WILSONBURG RD
CLARKSBURG, WV 26301-9265

BUSINESS REGISTRATION ACCOUNT NUMBER: 2275-3571

This certificate is issued on:

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

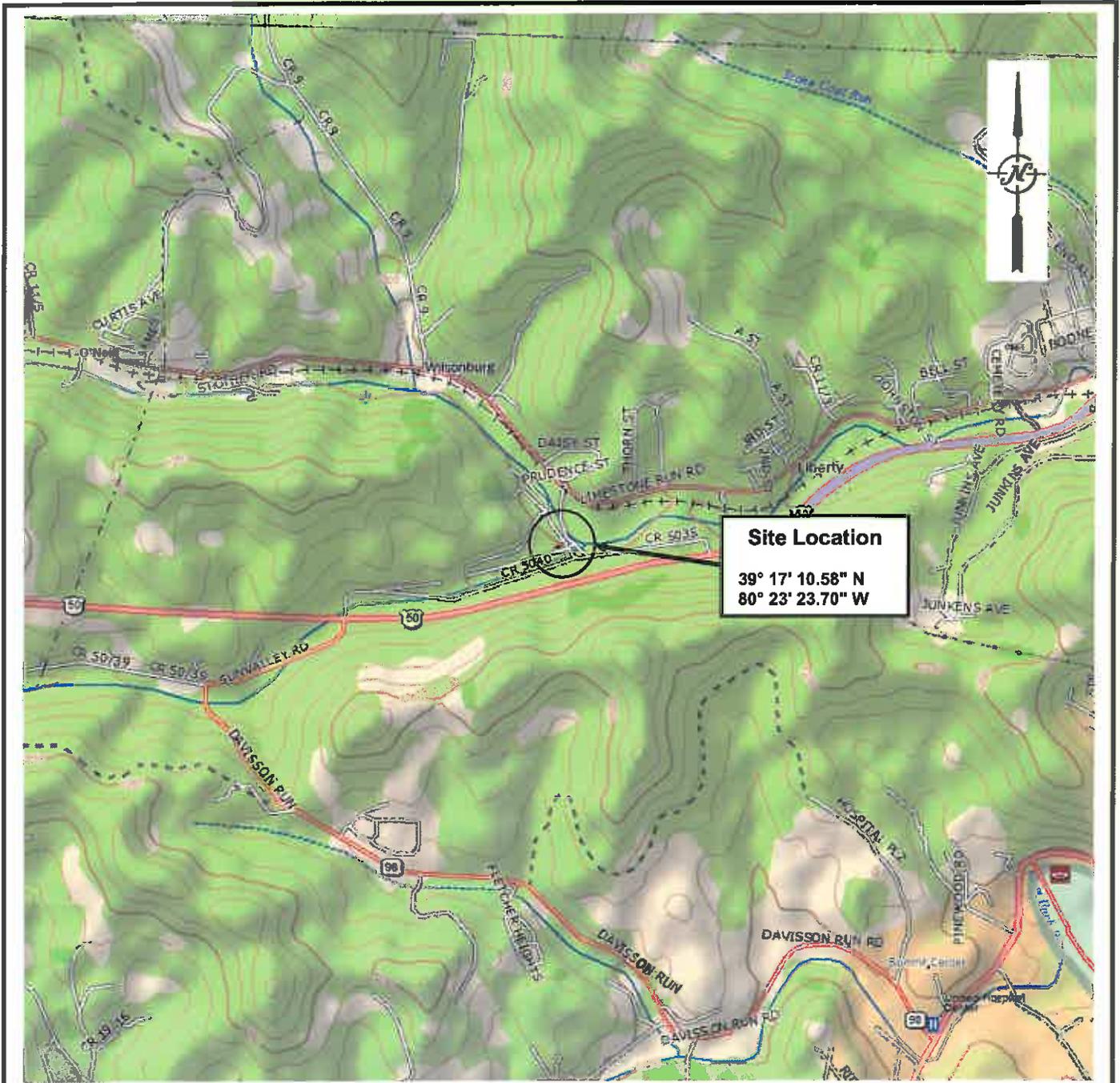
TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

atL006 v 4
L0101653668

NON-CONFIDENTIAL

ATTACHMENT B

Map(s)



Site Location
 39° 17' 10.58" N
 80° 23' 23.70" W

Reference:
 3-D TopoQuads © DeLorme,
 Yarmouth, Me 04096
 Source Data:
 7.5 Minute USGS
 Topographic Quadrangles

Wolf Summit, WV
 Clarksburg, WV

Vicinity Map

Scale 1" = 2000'

MSES Consultants, Inc.
 Clarksburg, West Virginia

Skana Aluminum Co.
 Wilsonburg, WV

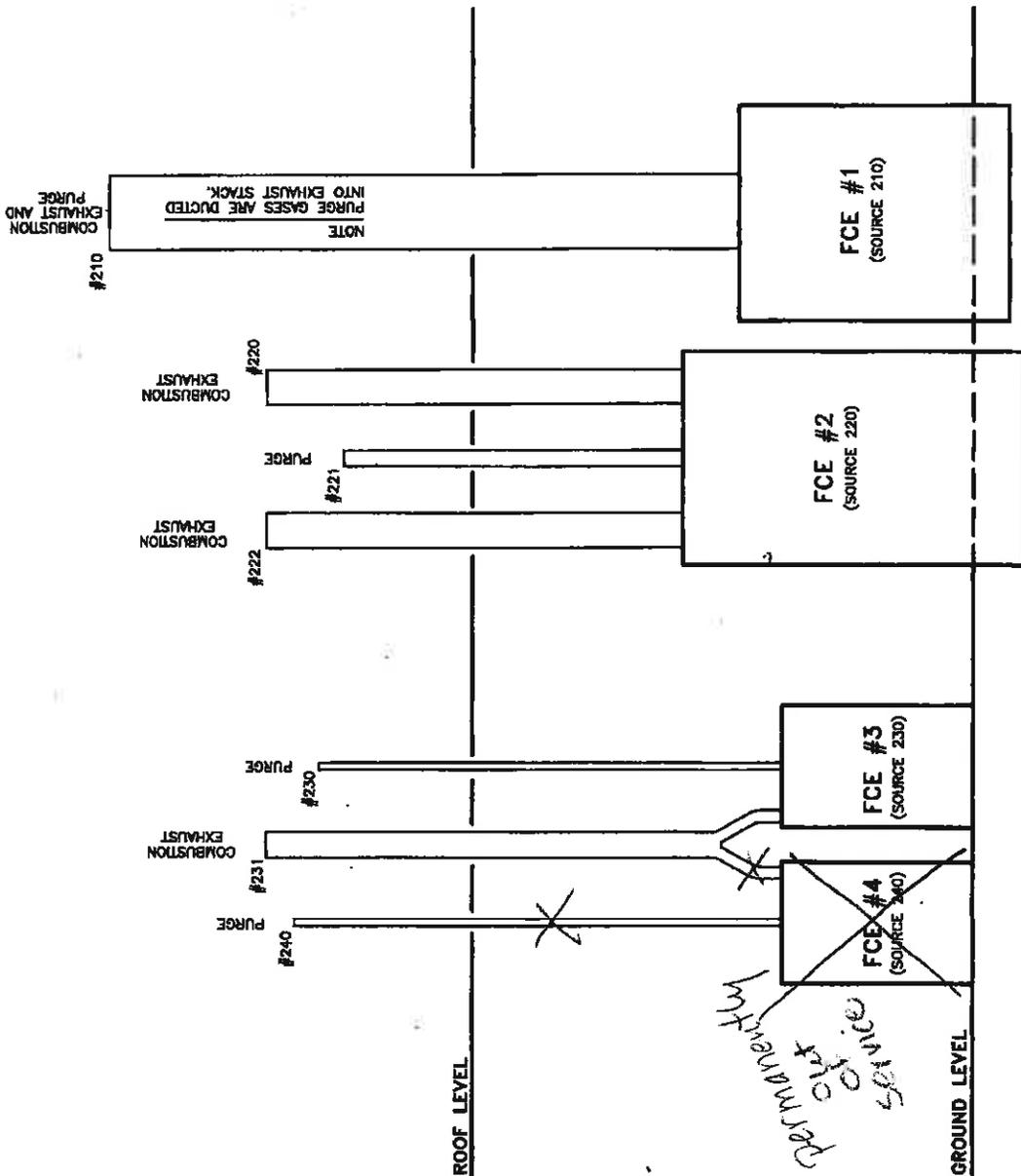
Reg 13 Air Permit

Project No. 15-158

Attachment B

ATTACHMENT F

Detailed Process Flow Diagram(s)



EMISSION POINT	STACK DIAMETER	HEIGHT ABOVE GROUND
#210	36"	52'-0"
#220	18"	38'-0"
#221	6"	36'-0"
#222	18"	38'-0"
#230	3 1/2"	36'-6"
#231	15"	38'-0"
#240		

FIGURE 4
ANNEALING FURNACE
STACK ELEVATIONS

PRECISION COIL, INC.

AIR EMISSIONS
 INVENTORY AND COMPLIANCE

NOT TO SCALE

CAD FILE NO. 90-228-1 / DSK 533

Drawn	JMS	10-95
Engineer	JJK	10-95
Checked	JJK	10-95
		Date



Environmental & Engineering Consultants

ATTACHMENT G
Process Description

ATTACHMENT G

PROCESS DESCRIPTION

The purpose of this Class II Administrative Update is for the operation of a previously permitted annealing furnace which had been decommissioned.

The Skana Aluminum Company process can best be described with respect to air emissions as follows:

Aluminum coils are unloaded via fork truck in the Receiving Area, and are then transported to the Cold Rolling Mill, where a continuous sheet of aluminum is drawn through a set of rolls which physically reduce the sheet thickness. The mill used at Skana Aluminum is categorized as a 4-HI cold rolling mill. A light hydrocarbon oil (similar to kerosene) is applied to the aluminum sheet as it passes through the roll. The MSDS sheet for this oil was provided in the R13-2880 permit application.

After passing through the Cold Rolling Mill, the aluminum sheet is re-rolled into a coil and is annealed in Annealing Furnaces 1, 2, or 3. Each of these furnaces uses natural gas as fuel for the indirect burners. The actual furnace payload area which contains coils of aluminum is inerted with nitrogen to provide a non-oxidizing environment. The furnaces are heated to a maximum temperature of 600 C. The inerting atmosphere from the furnaces contains a limited VOC content which remains on the coils from the rolling process. The total VOC content per furnace load is estimated to be less than ten (10) pounds per furnace cycle.

ATTACHMENT I

Emission Units Table

ATTACHMENT J

**Emission Points Data Summary
Sheet**

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type ¹	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (Chemical processes only)		All Regulated Pollutants - Chemical Name/CAS ³ (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used ⁶	Emission Concentration (ppmv or mg/m ³)	
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr				
231E	Upward Vertical Stack	230S	Annealing Furnace ³	NA	NA	NA	NA	CO NOX PM SO2 VOC	0.067 0.080 0.0061 0.0005 0.0044	0.294 0.350 0.027 0.0021 0.019	NA NA	NA	Gas/Vapor Solid	EE (AP-42)		

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (i.e., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.
- Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 VOC/20 minute batch).
- Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

ATTACHMENT L

Emissions Unit Data Sheet(s)

Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): 230S

<p>1. Name or type and model of proposed affected source:</p> <p>Westinghouse Aluminum Coil Annealing Furnace Model EC-13333 F-1</p>
<p>2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</p>
<p>3. Name(s) and maximum amount of proposed process material(s) charged per hour:</p> <p>Aluminum Coils - 917 lb/hr</p>
<p>4. Name(s) and maximum amount of proposed material(s) produced per hour:</p> <p>Aluminum Coils - 917 lb/hr</p>
<p>5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:</p> <p>None</p>

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

(c) Theoretical combustion air requirement (ACF/unit of fuel):

@

°F and

psia.

(d) Percent excess air: Not available

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

NA

(g) Proposed maximum design heat input:

0.8

× 10⁶ BTU/hr.

7. Projected operating schedule:

Hours/Day

10

Days/Week

5

Weeks/Year

52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@ 600 °F and 14.7 psia

a. NO _x	lb/hr	grains/ACF
b. SO ₂	lb/hr	grains/ACF
c. CO	lb/hr	grains/ACF
d. PM ₁₀	lb/hr	grains/ACF
e. Hydrocarbons	lb/hr	grains/ACF
f. VOCs	lb/hr	grains/ACF
g. Pb	lb/hr	grains/ACF
h. Specify other(s)	lb/hr	grains/ACF
	lb/hr	grains/ACF
	lb/hr	grains/ACF
	lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING

RECORDKEEPING

REPORTING

TESTING

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Attachment L
Emission Unit Data Sheet
 (INDIRECT HEAT EXCHANGER)

Control Device ID No. (must match List Form): NA

Equipment Information

1. Manufacturer: Westinghouse	2. Model No. EC 13333F 1 Serial No.
3. Number of units: 1	4. Use Annealing Furnace
5. Rated Boiler Horsepower: NA hp	6. Boiler Serial No.: NA
7. Date constructed: 1992	8. Date of last modification and explain: NA
9. Maximum design heat input per unit: 0.8 $\times 10^6$ BTU/hr	10. Peak heat input per unit: 0.8 $\times 10^6$ BTU/hr
11. Steam produced at maximum design output: LB/hr psig	12. Projected Operating Schedule: Hours/Day 10 Days/Week 5 Weeks/Year 52
13. Type of firing equipment to be used: <input type="checkbox"/> Pulverized coal <input type="checkbox"/> Spreader stoker <input type="checkbox"/> Oil burners <input checked="" type="checkbox"/> Natural Gas Burner <input type="checkbox"/> Others, specify	14. Proposed type of burners and orientation: <input type="checkbox"/> Vertical <input type="checkbox"/> Front Wall <input type="checkbox"/> Opposed <input type="checkbox"/> Tangential <input type="checkbox"/> Others, specify
15. Type of draft: <input type="checkbox"/> Forced <input type="checkbox"/> Induced	16. Percent of ash retained in furnace: %
17. Will flyash be reinjected? <input type="checkbox"/> Yes <input type="checkbox"/> No	18. Percent of carbon in flyash: %

Stack or Vent Data

19. Inside diameter or dimensions: 1.1 ft.	20. Gas exit temperature: 600 °F
21. Height: 38 ft.	22. Stack serves: <input checked="" type="checkbox"/> This equipment only <input type="checkbox"/> Other equipment also (submit type and rating of all other equipment exhausted through this stack or vent)
23. Gas flow rate: ft ³ /min	
24. Estimated percent of moisture: %	

Emissions Stream

37. What quantities of pollutants will be emitted from the boiler before controls?

Pollutant	Pounds per Hour lb/hr	grain/ACF	@ °F	PSIA
CO	0.067			
Hydrocarbons				
NO _x	0.080			
Pb				
PM ₁₀	0.0061			
SO ₂	0.0005			
VOCs	0.0044			
Other (specify)				

38. What quantities of pollutants will be emitted from the boiler after controls?

Pollutant	Pounds per Hour lb/hr	grain/ACF	@ °F	PSIA
CO				
Hydrocarbons				
NO _x				
Pb				
PM ₁₀				
SO ₂				
VOCs				
Other (specify)				

39. How will waste material from the process and control equipment be disposed of?

40. Have you completed an *Air Pollution Control Device Sheet(s)* for the control(s) used on this Emission Unit. no

41. Have you included the **air pollution rates** on the Emissions Points Data Summary Sheet? yes

42. Proposed Monitoring, Recordkeeping, Reporting, and Testing

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING PLAN: Please list (1) describe the process parameters and how they were chosen (2) the ranges and how they were established for monitoring to demonstrate compliance with the operation of this process equipment operation or air pollution control device.

TESTING PLAN: Please describe any proposed emissions testing for this process equipment or air pollution control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe the proposed frequency of reporting of the recordkeeping.

43. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

ATTACHMENT N

Supporting Emissions Calculations

SKANA ALUMINUM COMPANY

ATTACHMENT N - EMISSIONS CALCULATIONS

Annealing Furnace Products of Combustion

Annealing Furnace 3			
Pollutant	AP-42 Emission Factor ¹	Total Emissions	
	(lb/10 ⁶ ft ³)	(lb/hr)	(tons/yr)
CO	84	0.067	0.294
NOx	100	0.080	0.350
SO ₂	0.6	0.0005	0.0021
PM	7.6	0.0061	0.027
VOC	5.5	0.0044	0.019

Example : $84 \text{ lb CO}/10^6 \text{ ft}^3 \times 800 \text{ ft}^3/\text{hr} = 0.067 \text{ lb/hr CO}$
 $0.067 \text{ lb CO/hr} \times 8,760 \text{ hr/yr} / 2000 \text{ lb/ton} = 0.294 \text{ tpy CO}$

800000 btu/hr	burner size
1000 btu/cuft	natural gas heating value
800 cuft/hr	fuel usage
8760 hr/yr	annual operating hours

¹Reference: USEPA AP-42 Chapter 1, Section 4 Tables 1.4-1 and 1.4-2, dated 7/98

ATTACHMENT P

Public Notice

AIR QUALITY PERMIT NOTICE

Notice of Application

Notice is given that Skana Aluminum Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction Permit, for a natural gas fueled annealing furnace located at 345 Wilsonburg Road, in Clarksburg, in Harrison County, West Virginia. The latitude and longitude coordinates are: 39.28625 degrees north, and -80.39020 degrees west.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: 0.29 tons per year of carbon monoxide, 0.35 tons per year of oxides of nitrogen, 0.027 tons per year of particulate matter, 0.0021 tons per year of sulfur dioxide, 0.019 tons per year of volatile organic compounds.

Startup of operation began on or about the 1st day of January, 2013. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 6th day of April, 2015.

By: Steven Gallimore
Director of Operations
Skana Aluminum Company
345 Wilsonburg Road
Clarksburg, WV 26301

