AFTER-THE-FACT CLASS II ADMINISTRATIVE UPDATE TO REGULATION 13 PERMIT R13-3149 FOR THE SOUTH CHARLESTON STAMPING PLANT

Prepared for:

Gestamp West Virginia, LLC
3100 MacCorkle Avenue, SW
Building 307
South Charleston, West Virginia 25303

Prepared by:

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Project No. 0101-16-0217-100

October 2016

POTESTA

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SECTIONS I - III

GENERAL INFORMATION

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)*:
Gestamp West Virginia, LLC

2. Federal Employer ID No. ***(FEIN)***:
32-0375498

3. Name of facility *(if different from above)*:
South Charleston

4. The applicant is the:
☐ **OWNER** ☐ **OPERATOR** ☒ **BOTH**

5A. Applicant's mailing address:
3100 MacCorkle Ave., SW
Building 307
South Charleston, WV 25303

5B. Facility's present physical address:
3100 MacCorkle Ave., SW
Building 307
South Charleston, WV 25303

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? ☒ **YES** ☐ **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: BRC Operating Company LLC

8. Does the applicant own, lease, have an option to buy or otherwise have control of the *proposed site?* ☒ **YES** ☐ **NO**

➪ If **YES,** please explain: Applicant leases site.

➪ 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.): Metal Stamping Plant.

10. North American Industry Classification System **(NAICS)** code for the facility:
336370

11A. DAQ Plant ID No. (for existing facilities only):
039-00642

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
R13-3149

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

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits,** please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

From Charleston, West Virginia, take I-64 West to Exit 56 (Montrose Drive), turn right onto Montrose Drive and then turn left onto US Route 60 (MacCorkle Avenue). Travel 1 mile on MacCorkle Avenue past the intersection with G Street. The facility is located on the left.

12.B. New site address (if applicable): NA	12C. Nearest city or town: South Charleston	12D. County: Kanawha
12.E. UTM Northing (KM): 4,246.69	12F. UTM Easting (KM): 438.59	12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:
Gestamp installed one (1) hot stamping line and one (1) emergency generator.

14A. Provide the date of anticipated installation or change: – If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: 2015	14B. Date of anticipated Start-Up if a permit is granted: Currently operating.

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).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:
24 Hours Per Day 7 Days Per Week 52 Weeks Per Year

16. Is demolition or physical renovation at an existing facility involved? ☐ **YES** ☒ **NO**

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.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process *(if known)*. 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 *(if known)*. Provide this information as **Attachment D.**

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

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***) .
Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F.**

23. Provide a **Process Description** as **Attachment G.**
Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

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

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:

☐ Bulk Liquid Transfer Operations ☐ Haul Road Emissions ☐ Quarry
☐ Chemical Processes ☐ Hot Mix Asphalt Plant ☐ Solid Materials Sizing, Handling and Storage Facilities
☐ Concrete Batch Plant ☐ Incinerator ☐ Storage Tanks
☐ Grey Iron and Steel Foundry ☐ Indirect Heat Exchanger
☒ General Emission Unit, specify Hot Stamping Line and Emergency Generator

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

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

☐ Absorption Systems ☐ Baghouse ☐ Flare
☐ Adsorption Systems ☐ Condenser ☐ Mechanical Collector
☐ Afterburner ☐ Electrostatic Precipitator ☐ Wet Collecting System
☐ 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:

☒ Authority of Corporation or Other Business Entity ☐ Authority of Partnership
☐ Authority of Governmental Agency ☐ 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 _____ DATE: 10/13/16

(Please use blue ink) *(Please use blue ink)*

35B. Printed name of signee: Joshua Parsons		35C. Title: EHS Manager
35D. E-mail: JParsons@us.gestamp.com	36E. Phone: (304) 941-1800	36F. FAX: Use Email
36A. Printed name of contact person (if different from above):		36B. Title:
36C. E-mail:	36D. Phone:	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

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

ATTACHMENT A

BUSINESS CERTIFICATE

WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION CERTIFICATE

ISSUED TO:

[redacted]

2701 TROY CENTER DR 150

TROY, MI 48084-4755

BUSINESS REGISTRATION ACCOUNT NUMBER: 2270-8430

This certificate is issued on: 04/25/2012

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 is not transferrable and must be displayed at the location for which issued.

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 [illegible] 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
L1965230464

ATTACHMENT B

AREA MAP

POTESTA
Engineers and Environmental Consultants

DATE: October 2016

PROJECT NO. 0101-16-0217-100

MAPPING FOR VISUAL REPRESENTATION ONLY

SITE LOCATION MAP
GESTAMP WEST VIRGINIA
SOUTH CHARLESTON, KANAWHA COUNTY, WV
NOT TO SCALE

ATTACHMENT C

INSTALLATION AND START UP SCHEDULE

ATTACHMENT C

INSTALLATION AND STARTUP SCHEDULE

The proposed equipment was installed at the facility in 2015 and is currently operating.

ATTACHMENT D

REGULATORY DISCUSSION

ATTACHMENT D

REGULATORY DISCUSSION

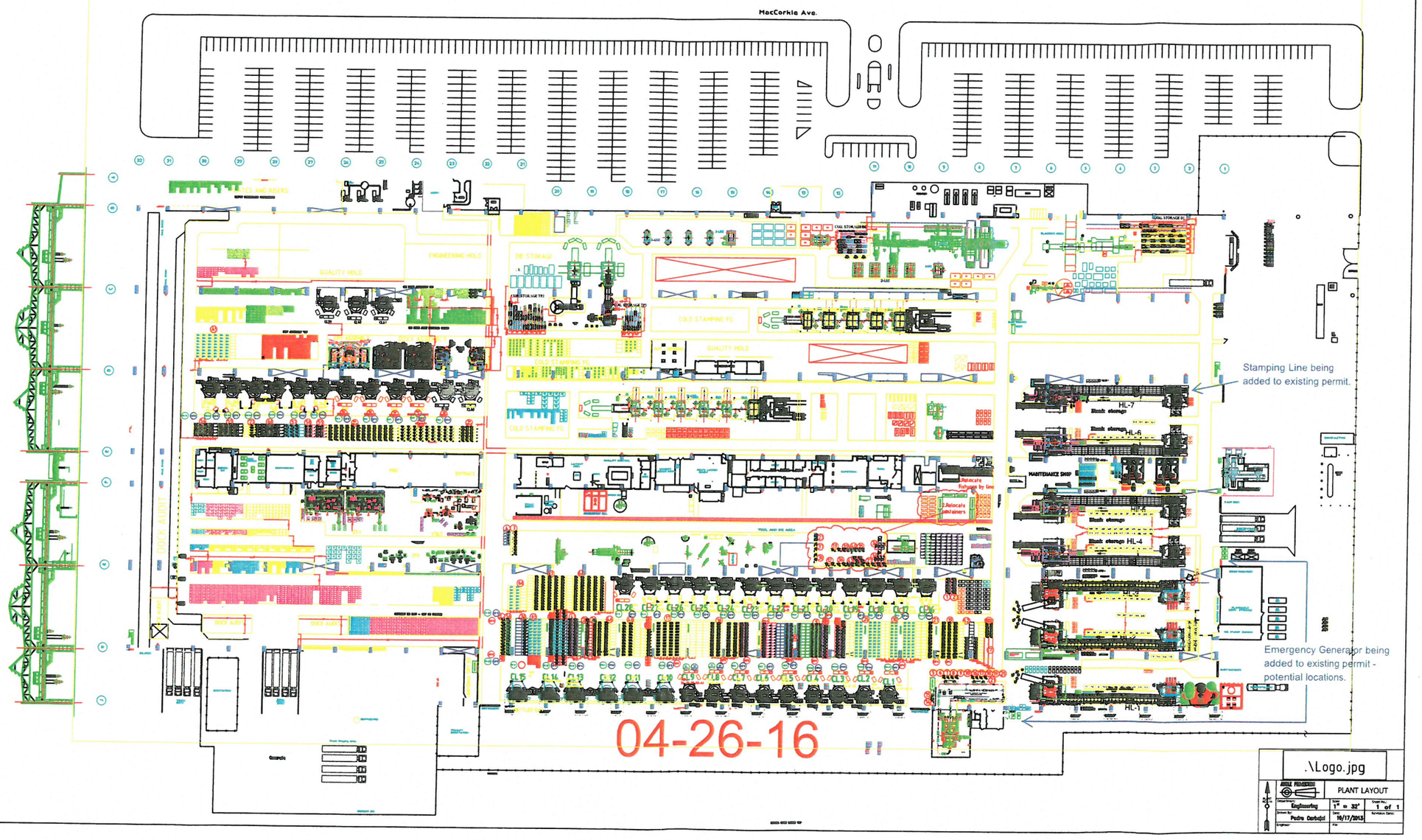
The revisions requested with this application (an additional stamping line and emergency generator) do not modify the regulatory basis of the permit.

ATTACHMENT E

PLOT PLAN

TOTAL BUILDING = 923,034 SQ. FT.

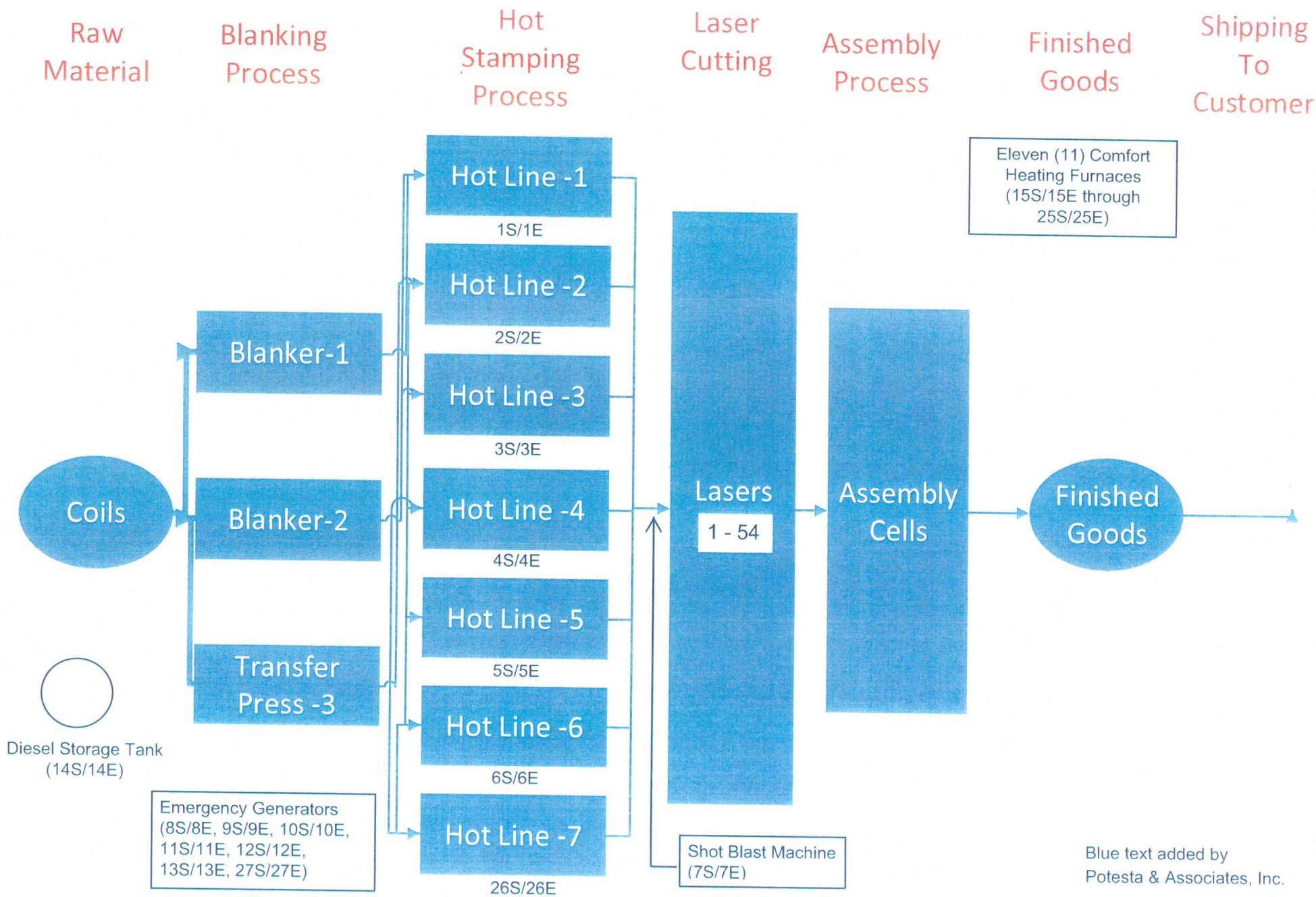
GESTAMP WEST VIRGINIA MAIN FLOOR



ATTACHMENT F

DETAILED PROCESS FLOW DIAGRAM

GWV Process Flow Map



ATTACHMENT G

PROCESS DESCRIPTION

ATTACHMENT G

PROCESS DESCRIPTION

Additional Stamping Line and Emergency Generator

Currently, Gestamp West Virginia, LLC (Gestamp), located in South Charleston, Kanawha County, West Virginia, has seven (7) stamping lines and seven (7) emergency generators installed at the facility. Six (6) stamping lines and six (6) emergency generators are currently permitted. Gestamp wishes to modify the existing permit to include the seventh stamping line and the seventh emergency generator. The new stamping line and emergency generator operate at the same design capacity as the currently permitted equipment.

Post Form Operations

Post form operations that generate emissions include: 1) shot blasting and 2) laser cutting for trims and holes. No increase in emissions from these post form operations is proposed.

The existing emissions estimate for shot blasting is based on hours of operation, not material throughput. Therefore, no additional emissions from shot blasting are anticipated, and increased capacity for shot blasting is not being requested at this time.

There are fifty-four (54) laser cutting booths at the facility. Laser cutting emissions are estimated based on the fastest speed of the laser head and thickest metal used at the facility. No additional cutting booths are being proposed at this time, and operation of the additional stamping line and emergency generator will not change the basis for laser cutting emissions.

ATTACHMENT I

EMISSION UNITS TABLE

Attachment I

Emission Units Table

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID[1]	Emission Point ID[2]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type[3] and Date of Change	Control Device[4]
26S	26E	Hot Stamp Furnace	2015	7.2 MMbtu/hr	NA	8C
27S	27E	Emergency Generator	2015	45 kW @ 1,800 RPM	NA	NA

[1] For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S, or other appropriate designation.
[2] For Emission Points use the following numbering system: 1E, 2E, 3E, or other appropriate designation.
[3] New, modification, removal
[4] For Control Devices use the following numbering system: 1C, 2C, 3C, or other appropriate designation.

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[7] (ppmv or mg/m^4)
		ID No.	Source	ID No.	Device Type	Short Term[2]	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
26E	Vertical Stack	26S	Hot Stamp Furnace	8C	Burner	NA	NA	PM Condensable	0.04	0.18	0.04	0.18	Solid	AP42	NA
								PM Filterable	0.01	0.06	0.01	0.06	Solid		
								PM/PM10/PM2.5	0.05	0.24	0.05	0.24	Solid		
								SO2	0.004	0.02	0.004	0.02	Gas		
								NOx	0.71	3.09	0.71	3.09	Gas		
								CO	0.59	2.60	0.59	2.60	Gas		
								VOC	0.04	0.17	0.04	0.17	Gas		
								HAPs	0.01	0.06	0.01	0.06	Vapor/Solid		
27E	Vertical Stack	27S	Emergency Generator	NA	NA	NA	NA	PM Condensable	0.007	0.0016	0.007	0.0016	Solid	AP42	NA
								PM Filterable	0.006	0.0016	0.006	0.0016	Solid		
								PM/PM10/PM2.5	0.013	0.0032	0.013	0.0032	Solid		
								SO2	0.0004	0.0001	0.0004	0.0001	Gas		
								NOx	1.46	0.37	1.46	0.37	Gas		
								CO	2.45	0.61	2.45	0.61	Gas		
								VOC	0.02	0.01	0.02	0.01	Gas		
								HAPs	0.02	0.01	0.02	0.01	Vapor/Solid		

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.

[1] Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

[2] Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

[3] List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS_2, VOCs, H_2S, Inorganics, Lead, Organics, O_3, NO, NO_2, SO_2, SO_3, all applicable Greenhouse Gases (including CO_2 and methane), etc. **DO NOT LIST** H_2, H_2O, N_2, O_2, and Noble Gases.

[4] 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).

[5] 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 minute batch).

[6] 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).

[7] 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/m^3) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO_2, use units of ppmv (See 45CSR10).

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data								
Emission Point ID No. *(Must match Emission Units Table)*	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow [1] (acfm) *at operating conditions*	Velocity (fps)	Ground Level *(Height above mean sea level)*	Stack Height [2] *(Release height of emissions above ground level)*	Northing	Easting
26E	1.5	400	NA	NA	603	90	4,246.69	438.59
27E	0.25	Ambient	NA	NA	603	10	4,246.69	438.59

[1] Give at operating conditions. Include inerts.
[2] Release height of emissions above ground level.
*See design details in the Appendix.

ATTACHMENT L

EMISSIONS UNIT DATA SHEET

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*): 26S

1. Name or type and model of proposed affected source: Rollerhearth Furnace
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.
3. Name(s) and maximum amount of proposed process material(s) charged per hour: 10,000 lb/hr blanks
4. Name(s) and maximum amount of proposed material(s) produced per hour 10,000 lb/hr stamped parts
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants: NA

* 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:

7.2 MMBtu/hr Pipeline Quality Natural Gas

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

<20 grains/100 ft^3 total sulfur
<1 grains/100 ft^3 H_2S
>978 Btu/ft3
4% Combined CO_2 and N_2

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

10 ft^3 air/ft^3 gas @ 60 °F and 14.7 psia.

(d) Percent excess air: 5-10% estimated

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

Forty (40) natural gas burners with a total of 7.2 MMBtu/hr MDHI

(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: 7.2 × 10^6 BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

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

@ °F and psia

a. NO_X	0.71	lb/hr	grains/ACF
b. SO_2	0.004	lb/hr	grains/ACF
c. CO	0.59	lb/hr	grains/ACF
d. PM_{10}	0.05	lb/hr	grains/ACF
e. Hydrocarbons		lb/hr	grains/ACF
f. VOCs	0.04	lb/hr	grains/ACF
g. Pb		lb/hr	grains/ACF
h. Specify other(s)			
HAPs	0.01	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
As required by the existing permit.	As required by the existing permit.
REPORTING	**TESTING**
As required by the existing permit.	As required by the existing permit.

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

NA

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*): 27S

1. Name or type and model of proposed affected source: Emergency Generator
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.
3. Name(s) and maximum amount of proposed process material(s) charged per hour: 45 kW @ 1,800 RPM
4. Name(s) and maximum amount of proposed material(s) produced per hour: NA
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants: NA

* 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:

646 scf/hr Pipeline Quality Natural Gas

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

<20 grains/100 ft^3 total sulfur
<1 grains/100 ft^3 H_2S
>978 Btu/ft3
4% Combined CO_2 and N_2

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

10 ft^3 air/ft^3 gas @ 60 °F and 14.7 psia.

(d) Percent excess air:

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

NA

(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: 0.7 × 10^6 BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

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

@ °F and psia

a. NO_X	1.46	lb/hr	grains/ACF
b. SO_2	0.0004	lb/hr	grains/ACF
c. CO	2.45	lb/hr	grains/ACF
d. PM_{10}	0.013	lb/hr	grains/ACF
e. Hydrocarbons		lb/hr	grains/ACF
f. VOCs	0.02	lb/hr	grains/ACF
g. Pb		lb/hr	grains/ACF
h. Specify other(s)			
Total HAPs	0.02	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
Gestamp proposes to monitor hours of operation for the emergency generator.	Gestamp proposes to record the hours of operation for the emergency generator.
REPORTING	**TESTING**
No reporting is proposed.	No testing is proposed.

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

NA

ATTACHMENT N

SUPPORTING EMISSIONS CALCULATIONS

Existing PTE[1]

Emission Type	Uncontrolled		Controlled	
	lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5	11.07	47.28	0.82	2.39
SO2	0.056	0.152	0.056	0.152
NOx	17.66	27.48	17.66	27.5
CO	22.20	24.93	22.20	24.93
VOC	0.61	1.42	0.61	1.42
HAPs	0.29	0.51	0.29	0.51

New PTE

Emission Type	Uncontrolled		Controlled	
	lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5	11.14	47.52	0.89	2.63
SO2	0.06	0.17	0.06	0.17
NOx	19.83	30.94	19.83	30.94
CO	25.24	28.14	25.24	28.14
VOC	0.67	1.60	0.67	1.60
HAPs	0.32	0.58	0.32	0.58

1. Existing PTE from Permit Application for R13-3149.

Total Emissions

Proposed Stamping Line

Emission Type	Uncontrolled		Controlled	
	lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5	0.05	0.24	0.05	0.24
SO2	0.004	0.02	0.004	0.02
NOx	0.71	3.09	0.71	3.09
CO	0.59	2.60	0.59	2.60
VOC	0.04	0.17	0.04	0.17
HAPs	0.01	0.06	0.01	0.06

Proposed Emergency Generator

Emission Type	Uncontrolled		Controlled	
	lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5	0.013	0.003	0.013	0.003
SO2	0.0004	0.0001	0.0004	0.0001
NOx	1.46	0.37	1.46	0.37
CO	2.45	0.61	2.45	0.61
VOC	0.02	0.01	0.02	0.01
HAPs	0.02	0.01	0.02	0.01

Total

Emission Type	Uncontrolled		Controlled	
	lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5	0.07	0.24	0.07	0.24
SO2	0.005	0.02	0.005	0.02
NOx	2.17	3.46	2.17	3.46
CO	3.04	3.21	3.04	3.21
VOC	0.06	0.18	0.06	0.18
HAPs	0.03	0.07	0.03	0.07

Hot Stamping Line (HL-7) Natural Gas Fired Furnace (26S, 26E)

Burner Rating =	7.2	MMBtu/hr
Conversion from lb/10^6 scf to lb/MMBtu (divide by)[1] =	1,020	Btu/cf
Operating Hours =	8,760	hrs/year

Emission Type	Emissions (lbs/MMscf)[2]	Emissions (lbs/MMBtu)	Uncontrolled		Controlled	
			lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5 Condensable	5.7	5.59E-03	0.04	0.18	0.04	0.18
PM/PM10/PM2.5 Filterable	1.9	1.86E-03	0.01	0.06	0.01	0.06
PM/PM10/PM2.5	7.6	7.45E-03	0.05	0.24	0.05	0.24
SO2	0.6	5.88E-04	0.004	0.02	0.004	0.02
NOx	100	9.80E-02	0.71	3.09	0.71	3.09
CO	84	8.24E-02	0.59	2.60	0.59	2.60
VOC	5.5	5.39E-03	0.04	0.17	0.04	0.17

1. Emission Factors from AP-42 Tables 1.4-1 through 1.4-4 and original permit application.

Gestamp West Virginia, LLC
Stamping Line and Emergency Generator

POTESTA & ASSOCIATES, INC.
Project No. 0101-16-0217-100

By: JJD
Date: 07/22/2016

Checked By: ADM
Date: 08/16/2016

HAPs for Hot Stamping Line Natural Gas Fired Furnace (26S, 26E)

Burner Rating =	7.2	MMBtu/hr
Operating Hours =	8,760	hrs/yr
Conversion from lb/10^6 scf to lb/MMBtu (divide by)[1] =	1,020	Btu/cf

CAS No.	Hazardous Air Pollutants	EF[1]		Uncontrolled		Controlled	
		lb/10^6 scf	lb/MMBtu	lb/hr	tpy	lb/hr	tpy
91-57-6	2-Methylnaphthalene	2.40E-05	2.35E-08	1.69E-07	7.42E-07	1.69E-07	7.42E-07
56-49-5	3-Methylchloranthrene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
57-97-6	7,12-Dimethylbenz(a)anthracene	1.60E-05	1.57E-08	1.13E-07	4.95E-07	1.13E-07	4.95E-07
83-32-9	Acenaphthene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
203-96-8	Acenaphthylene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
120-12-7	Anthracene	2.40E-06	2.35E-09	1.69E-08	7.42E-08	1.69E-08	7.42E-08
56-55-3	Benz(a)anthracene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
71-43-2	Benzene	2.10E-03	2.06E-06	1.48E-05	6.49E-05	1.48E-05	6.49E-05
50-32-8	Benzo(a)pyrene	1.20E-06	1.18E-09	8.47E-09	3.71E-08	8.47E-09	3.71E-08
205-99-2	Benzo(b)fluoranthene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
191-24-2	Benzo(g,h,i)perylene	1.20E-06	1.18E-09	8.47E-09	3.71E-08	8.47E-09	3.71E-08
205-82-3	Benzo(k)fluoranthene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
218-01-9	Chrysene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
53-70-3	Dibenzo(a,h)anthracene	1.20E-06	1.18E-09	8.47E-09	3.71E-08	8.47E-09	3.71E-08
25321-22-6	Dichlorobenzene	1.20E-03	1.18E-06	8.47E-06	3.71E-05	8.47E-06	3.71E-05
206-44-0	Fluoranthene	3.00E-06	2.94E-09	2.12E-08	9.28E-08	2.12E-08	9.28E-08
86-73-7	Fluorene	2.80E-06	2.75E-09	1.98E-08	8.66E-08	1.98E-08	8.66E-08
50-00-0	Formaldehyde	7.20E-02	7.06E-05	5.08E-04	2.23E-03	5.08E-04	2.23E-03
110-54-3	Hexane	1.80E+00	1.76E-03	1.27E-02	5.57E-02	1.27E-02	5.57E-02
193-39-5	Indeno(1,2,3-cd)pyrene	1.80E-06	1.76E-09	1.27E-08	5.57E-08	1.27E-08	5.57E-08
91-20-3	Naphthalene	6.10E-04	5.98E-07	4.31E-06	1.89E-05	4.31E-06	1.89E-05
85-01-8	Phenanathrene	1.70E-05	1.67E-08	1.20E-07	5.26E-07	1.20E-07	5.26E-07
129-00-0	Pyrene	5.00E-06	4.90E-09	3.53E-08	1.55E-07	3.53E-08	1.55E-07
108-88-3	Toluene	3.40E-03	3.33E-06	2.40E-05	1.05E-04	2.40E-05	1.05E-04
7440-38-2	Arsenic	2.00E-04	1.96E-07	1.41E-06	6.18E-06	1.41E-06	6.18E-06
7440-41-7	Beryllium	1.20E-05	1.18E-08	8.47E-08	3.71E-07	8.47E-08	3.71E-07
7440-43-9	Cadmium	1.10E-03	1.08E-06	7.76E-06	3.40E-05	7.76E-06	3.40E-05
7440-47-3	Chromium	1.40E-03	1.37E-06	9.88E-06	4.33E-05	9.88E-06	4.33E-05
7440-48-4	Cobalt	8.40E-05	8.24E-08	5.93E-07	2.60E-06	5.93E-07	2.60E-06
7439-96-5	Manganese	3.80E-04	3.73E-07	2.68E-06	1.17E-05	2.68E-06	1.17E-05
7439-97-6	Mercury	2.60E-04	2.55E-07	1.84E-06	8.04E-06	1.84E-06	8.04E-06
7440-02-0	Nickel	2.10E-03	2.06E-06	1.48E-05	6.49E-05	1.48E-05	6.49E-05
7782-49-2	Selenium	2.40E-05	2.35E-08	1.69E-07	7.42E-07	1.69E-07	7.42E-07
			VOC HAPs Subtotal	0.01	0.06	0.01	0.06
			Metal HAPs Subtotal	0.00004	0.0002	0.00004	0.0002
			Total HAPs	0.01	0.06	0.01	0.06

References:

1. Emission factors from AP-42 Table 1.4-3 and Table 1.4-4 and original permit application

Emergency Generator (27S, 27E)

Generator Rating =	45	kW @ 1800 RPM
Heat Input =	646	scf/hr
Heat Input =	0.0006	MMscf/hr
Operating Hours =	500	hrs/year
Heat Content of Fuel =	1,020	Btu/cf

Emission Type	Emissions lb/MMBtu[2]	Emissions (lbs/MMscf)	Uncontrolled		Controlled	
			lb/hr	tpy	lb/hr	tpy
PM/PM10/PM2.5 Condensable	0.0099	10.11	0.007	0.0016	0.007	0.0016
PM/PM10/PM2.5 Filterable	0.0095	9.69	0.006	0.0016	0.006	0.0016
PM/PM10/PM2.5	0.0194	19.80	0.013	0.0032	0.013	0.0032
SO2	0.00059	0.60	0.0004	0.0001	0.0004	0.0001
NOx	2.21	2254.20	1.46	0.37	1.46	0.37
CO	3.72	3794.40	2.45	0.61	2.45	0.61
VOC	0.0296	30.19	0.02	0.01	0.02	0.01
					Round to	2
						3

1. Emission Factors from AP-42 Table 3.2-3 and original permit application.

HAPs for Emergency Generator (27S, 27E)

Heat Input =	646	scf/hr
Heat Input =	0.0006	MMscf/hr
Operating Hours =	500	hrs/year
Heat Content of Fuel =	1,020	Btu/cf
	0.66	MMBtu/hr

Regulated Pollutant	Emission Factor[1] lb/MMBtu	Hourly Emissions lb/hr	Annual Emissions tpy
1,1,2,2-tetrachloroethane	2.53E-05	1.67E-05	4.17E-06
1,1,2-trichloroethane	1.53E-05	1.01E-05	2.52E-06
1,3-Butadiene	6.63E-04	4.37E-04	1.09E-04
1,3-dichloropropene	1.27E-05	8.37E-06	2.09E-06
Acetaldehyde	2.79E-03	1.84E-03	4.60E-04
Acrolein	2.63E-03	1.73E-03	4.33E-04
Benzene	1.58E-03	1.04E-03	2.60E-04
Carbon Tetrachloride	1.77E-05	1.17E-05	2.92E-06
Chlorobenzene	1.29E-05	8.50E-06	2.13E-06
Chloroform	1.37E-05	9.03E-06	2.26E-06
Ethylbenzene	2.48E-05	1.63E-05	4.09E-06
Ethylene dibromide	2.13E-05	1.40E-05	3.51E-06
Formaldehyde	2.05E-02	1.35E-02	3.38E-03
Methanol	3.06E-03	2.02E-03	5.04E-04
Methylene Chloride	4.12E-05	2.71E-05	6.79E-06
Naphthalene	9.71E-05	6.40E-05	1.60E-05
PAH	1.41E-04	9.29E-05	2.32E-05
Styrene	1.19E-05	7.84E-06	1.96E-06
Toluene	5.58E-04	3.68E-04	9.19E-05
Vinyl chloride	7.18E-06	4.73E-06	1.18E-06
Xylene	1.95E-04	1.28E-04	3.21E-05
	Total HAPs	0.02	0.01

1. HAPs and Emission Factors from AP-42 Table 3.2-3.

ATTACHMENT O

MONITORING/RECORDKEEPING/REPORTING/TESTING PLANS

ATTACHMENT O

MONITORING/RECORDKEEPING/REPORTING/TESTING PLANS

Gestamp West Virginia, LLC requests monitoring, recordkeeping, reporting and testing as stated in the existing permit.

ATTACHMENT P

PUBLIC NOTICE

LEGAL ADVERTISEMENT

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Gestamp West Virginia, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for an After-the-Fact Class II Administrative Update of Permit R13-3149 at their facility located on MacCorkle Avenue in South Charleston, Kanawha County, West Virginia. The latitude and longitude coordinates are: 38.366680 and -81.699101.

The applicant estimates the potential increase to discharge the following Regulated Air Pollutants will be: PM of 0.24 tons per year (tpy); PM10 of 0.24 tpy; PM2.5 of 0.24 tpy; SO2 of 0.02 tpy; NOx of 3.46 tpy; CO of 3.21 tpy; VOC of 0.18 tpy; and HAPs of 0.07 tpy.

Startup of operation under this permit is planned to begin on or about the 30th day of September, 2016. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, 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 1250, during normal business hours.

Dated this the (PLEASE INSERT DATE) day of November, 2016.

By: Gestamp West Virginia, LLC
Joshua Parsons
EHS Manager
3100 MacCorkle Avenue, SW
Building 307
South Charleston, WV 25303

ATTACHMENT R

AUTHORITY FORMS

Attachment R
AUTHORITY OF CORPORATION
OR OTHER BUSINESS ENTITY (DOMESTIC OR FOREIGN)

TO: The West Virginia Department of Environmental Protection, Division of Air Quality

DATE: 09/06, 2016

ATTN.: Director

Corporation's / other business entity's Federal Employer I.D. Number 32-0375498

The undersigned hereby files with the West Virginia Department of Environmental Protection, Division of Air Quality, a permit application and hereby certifies that the said name is a trade name which is used in the conduct of an incorporated business or other business entity.

Further, the corporation or the business entity certifies as follows:

(1) Joshua Parsons (is/are) the authorized representative(s) and in that capacity may represent the interest of the corporation or the business entity and may obligate and legally bind the corporation or the business entity.

(2) The corporation or the business entity is authorized to do business in the State of West Virginia.

(3) If the corporation or the business entity changes its authorized representative(s), the corporation or the business entity shall notify the Director of the West Virginia Department of Environmental Protection, Division of Air Quality, immediately upon such change.

E. Lambrook

President or Other Authorized Officer
(Vice President, Secretary, Treasurer or other official in charge of a principal business function of the corporation or the business entity)

(If not the President, then the corporation or the business entity must submit certified minutes or bylaws stating legal authority of other authorized officer to bind the corporation or the business entity).

Secretary

Gestamp of WV

Name of Corporation or business entity