



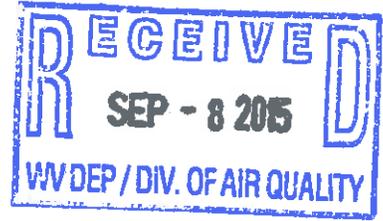
SPECIAL METALS CORPORATION

3200 Riverside Dr.

Huntington, WV 25705-1771 U.S.A.
(304) 526-5389 Fax:
www.specialmetals.com

2 September 2015

ID # 011-00007
Reg R12-2532G
Company Huntington Alloys Corp.
Facility Huntington Initials SB
Facility



Beverly D. McKeone
NSR Program Manager
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Dear Ms. McKeone,

Please find the enclosed application, Class I Administrative Update. This administrative update is being submitted to rectify a clerical error on application R30—0110007-2013.

The number of rods used per day listed in section 4.1.2 was listed at 960. This number needs to be corrected to state 3360* rods used per day, total.

The emissions numbers on the application and the numbers that were printed in the newspaper are correct, no modification is necessary in this section.

In Attachment S 13.1.2 the table should only include one line with the above total of 3360. The additional lines were clerical error.

*In an email received from Robert Mullens requesting the number of rods used per day be changed, he listed the number be raised to 2880. The asterisked number above represents the seven total permitted arc air cutters. In Mr. Mullens' email only 6 arc air cutters were counted.

If you should have any questions or require further information please do not hesitate to contact me at (304) 526-5259.

Sincerely,

Tom Bell
Environmental Manager - HBE

Entire Document
NON-CONFIDENTIAL



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(304) 526-5389100

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TOM BELL

Environmental Manager - HBE

West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston WV 25304
Attn: Bobbie Scroggie

RE: class II administrative request and title V minor modification – Huntington Alloys Corp Facility in Huntington, West Virginia (permit R30-01100007-2013)

Dear Ms. Scroggie,

Huntington Alloys (R30-01100007-2013) is submitting for your approval the request for a class II Administrative Update and Title V minor modification to allow for the following new emission units at this facility:

- Arc Air Cutter (emission unit TP-15-P)
- Arc Air Cutter (emission unit TP-16-P)
- Arc Air Cutter (emission unit TP-17-P)
- Arc Air Cutter (emission unit TP-18-P)

The estimated pollutants emissions for the proposed new equipment do not exceed the thresholds for a "modification" under 45CSR13-2-2.17. However since there will be a net emissions increase from the proposed change, a Class II Administrative Update to the existing permit for the facility is requested.

Process Description

This project will be installed in the Thistle Processing building, which prepares scrap material by sizing, cleaning, and drying available metal alloy pieces for internal use and resale. The proposed new cutter will be used to size alloy scrap into smaller pieces before being melted and used in the manufacturing operations. The arc air cutter will be installed as a stationary source.

Regulatory Review

The following regulatory review identifies potentially applicable regulatory requirements that limit emissions from the proposed new emission units.

§45-7-3. Emissions of smoke and/or particulate matter prohibited and standards of measurement

3.1 No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source of operation which is greater than 20 (twenty) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6 and 3.7.

§45-7-4. Control and Prohibition of Particulate Emissions by weight from Manufacturing Process Source Operations.

4.1 No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in table 45-7a found at the end of this rule.

Applicable Submittal

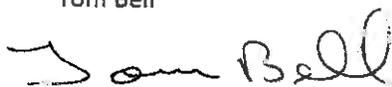
For this submittal, the following information is being submitted for a class II Administrative Update and Title V Minor Modification:

- Class II Administrative Update Forms (attachment 1)
- Title V Permit Minor Modification Form (attachment 2)
- Supporting Calculations for Emissions Estimates (attachment 3)
- Plot plan (attachment 4) a plot plan for thistle processing as well as a plot plan for the entire facility is included.
- Process Flow Diagram (attachment 5) – shows the cutting and cleaning process of the scrap material
- Business Certificate (attachment 6)

Since the Title V permit already has an arc cutter limitations within Condition 13.1 for Thistle Processing, only conditions 1.1, 13.1.1 and 13.1.1 will need to be revised to include these new sources. These suggested Title V permit condition revisions are included in on the Title V Permit Revision Form (attached S Form).

Please have the contents of the Class II Administrative Update and Title V Minor Modification request reviewed and, if in order, it is requested that someone from the DAQ provide a written indication that the facility can proceed with the desired with the desired changes in operation equipment . A class 1 legal ad will be placed in a newspaper local to the facility in accordance with 45CSR 13(45-13-8). An affidavit of publication will be submitted once received. I can be contacted by phone or email at the following: TBell@specialmetals.com or (304)526-5259.

Tom Bell



Environmental Manager HBE

AFFIDAVIT OF PUBLICATION

I, Becky Jarvis being duly sworn, depose and say that I am Legal Clerk for *The Herald-Dispatch*, HD Media Co., LLC, who publishes at Huntington, Cabell County, West Virginia, the newspaper *The Herald-Dispatch*, an Independent newspaper, the morning seven days each week, Monday through Sunday including New Year's Day, Memorial Day, the Fourth of July, Labor Day, Thanksgiving and Christmas; that I have been duly authorized by the Board of Directors of such corporation and the newspaper mentioned herein; that the legal advertisement attached in the left margin of this affidavit and made a part herof and bearing number 32754 was duly published in the *The Herald-Dispatch* once a week for 1 successive weeks, commencing with its issue of 06/05/2015 and ending with the issue of 06/05/2015, that said legal advertisement was published on the following dates: 06/05/2015 that the cost of publishing said annexed advertisement as aforesaid was \$ 48.30; that such newspaper in which such legal advertisement was published has been and is now published regularly, at least as frequently as once a week for at least fifty weeks during the calendar year as prescribed by its mailing permit and has been so published in the municipality of Huntington, Cabell County, West Virginia, for at least one year immediately preceding the date on which the legal advertisement set forth herin was delivered to such newspaper for publication; that such newspaper is a newspaper of "general circulation" as defined in article 3, chapter 59, of the West Virginia Code within the publication area or areas of the municipality of Huntington, Cabell, Putnam and Wayne Counties, West Virginia, and that such newspaper is circulated to the general public at a definite price or consideration; that such newspaper on each date published consists of not less than four pages without a cover; and that it is a newspaper to which the general public resorts for passing events of a political, religious, commercial and social nature, and for current happenings, announcements, miscellaneous reading matter, advertisements and other notices.

Taken, subscribed and sworn to before me in my said county this day: 06/05/2015

My commission expires

June 6, 2022

Constance S. Rappold
 Notary Public

Cabell County, West Virginia



[Signature]

**Air Quality
Permit Notice**

Notice is given that Huntington Alloys Corporation has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a class II Administrative Update for the metal rolling mill located on Riverside Drive in Huntington WV, in Cabell County, West Virginia.

The applicant estimates that the increased potential to discharge the following to regulate Air Pollutants will be

PM/PM10
0.13 tons/year
Mn
0.11 tons/year
Ni
0.02 tons/year
HAPs
0.008 ton/year

Start up for the operation is planned to begin upon receipt of permit.

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 ext. 1227, during normal business hours.

BY:
**Huntington Alloys
Corporation
Tom Bell,
Environmental
Manager HBE
3200 Riverside Dr
Huntington WV,
25705
LH-32754
6-5-2015**

Air Quality Permit Notice

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The applicant estimates that the increased potential to discharge the following to regulate Air Pollutants will be

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HAPs 0.008 ton/year

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

BY:

Huntington Alloys Corporation
Tom Bell, Environmental Manager HBE
3200 Riverside Dr
Huntington WV, 25705

ATTACHMENT 1

Class II Administrative Update Forms



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): Huntington Alloys Corp. | | 2. Federal Employer ID No. (FEIN): 5 5-0785766 | |
| 3. Name of facility (if different from above): | | 4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH | |
| 5A. Applicant's mailing address: 3200 Riverside Drive Huntington West Virginia 25705 | | 5B. Facility's present physical address: 3200 Riverside Drive Huntington West Virginia 25705 | |
| 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: owner , operator - 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.): Metals Rolling Mill – install four arc cutters | | 10. North American Industry Classification System (NAICS) code for the facility: 331491 | |
| 11A. DAQ Plant ID No. (for existing facilities only): 0 11 – 0 0 0 0 7 | | 11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R30-01100007-2013 | |

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**.

Interstate 64 West to 29th Street exit (Route 60) go towards Huntington on Route 60 to Washington Road Intersection with Route 60. Make a right and go across Washington Road Bridge. Right turn on Riverside Drive. Enter plant at Main Gate.

12.B. New site address (if applicable):

12C. Nearest city or town:

12D. County:

Huntington

Cabell

12.E. UTM Northing (KM): 4252.30

12F. UTM Easting (KM): 379.2

12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:

Adding a belt blaster at the Caledonian/Thistle building.

14A. Provide the date of anticipated installation or change: 06/ /2015

- If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /

14B. Date of anticipated Start-Up if a permit is granted:

6/ /2015

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:

Hours Per Day 24

Days Per Week 7

Weeks Per Year 52

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). **Included**

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. n/a

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

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

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

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 type="checkbox"/> Indirect Heat Exchanger | |

General Emission Unit, specify **Arc Cutters**

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 |

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 Tom Bell DATE: 9-4-15
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Tom Bell 35C. Title: Environmental Manager HBE

35D. E-mail: tbell@specialmetals.com 36E. Phone: 304-526-5259 36F. FAX: 304-526-5437

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:

- | | |
|--|---|
| <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 checked="" type="checkbox"/> Attachment D: Regulatory Discussion | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input 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 checked="" 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.

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

**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 ³) |
|---|----------------------------------|---|------------|--|-------------|---|-------------|--|---|---------------|---|---------------|---|-------------------------------|--|
| | | ID No. | Source | ID No. | Device Type | Short Term ² | Max (hr/yr) | | lb/hr | ton/yr | lb/hr | ton/yr | | | |
| TP-15-S | | T-15-P | Arc Cutter | | | | | PM/PM ₁₀ HAPs | 0.03 0.002 | 0.13 0.008 | 0.03 0.002 | 0.13 0.008 | | | |
| TP-16-S | | T-15-P | Arc Cutter | | | | | PM/PM ₁₀ HAPs | 0.03 0.002 | 0.13 0.008 | 0.03 0.002 | 0.13 0.008 | | | |
| TP-17-S | | T-15-P | Arc Cutter | | | | | PM/PM ₁₀ HAPs | 0.03 0.002 | 0.13 0.008 | 0.03 0.002 | 0.13 0.008 | | | |
| TP-18-S | | T-15-P | Arc Cutter | | | | | PM/PM ₁₀ HAPs | 0.03 0.002 | 0.13 0.008 | 0.03 0.002 | 0.13 0.008 | | | |

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, 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.
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 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).
⁷ 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).

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).

- ¹ Give at operating conditions. Include inerts.
- ² Release height of emissions above ground level.

ATTACHMENT 2

Title V Minor Modification Form

**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*):

| |
|--|
| <p>1. Name or type and model of proposed affected source:</p> <p>ARC CUTTER ARC CUTTER ARC CUTTER ARC CUTTER</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>METAL 15,000LBS METAL 15,000LBS METAL 15,000LBS METAL 15,000LBS</p> |
| <p>4. Name(s) and maximum amount of proposed material(s) produced per hour:</p> <p>METAL 15,000LBS METAL 15,000LBS METAL 15,000LBS METAL 15,000LBS</p> |
| <p>5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:</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: | | | |
| NONE | | | |
| (b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash: | | | |
| NONE | | | |
| (c) Theoretical combustion air requirement (ACF/unit of fuel): | | | |
| @ | | °F and | |
| | | psia. | |
| (d) Percent excess air: | | | |
| (e) Type and BTU/hr of burners and all other firing equipment planned to be used: | | | |
| NONE | | | |
| (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: | | | |
| N/A | | | |
| (g) Proposed maximum design heat input: × 10⁶ 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 | | lb/hr | | grains/ACF |
| b. SO ₂ | | lb/hr | | grains/ACF |
| c. CO | | lb/hr | | grains/ACF |
| d. PM ₁₀ | SEE ATTACHMENT 3 | lb/hr | UNKNOWN | grains/ACF |
| e. Hydrocarbons | | lb/hr | | grains/ACF |
| f. VOCs | | lb/hr | | grains/ACF |
| g. Pb | | lb/hr | | grains/ACF |
| h. Specify other(s) | | | | |
| HAPs | SEE ATTACHMENT 3 | lb/hr | UNKNOWN | 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
 NONE

RECORDKEEPING
 RECORD THE NUMBER OF RODS USED DAILY

REPORTING
 NONE

TESTING
 NONE

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
 APPLY GENERALLY APPROVED INDUSRTY PRATICES AND OPERATING INSTURCTIONS

Attachment S
Title V Permit Revision Information

| 1. New Applicable Requirements Summary | |
|---|---|
| Mark all applicable requirements associated with the changes involved with this permit revision: | |
| <input type="checkbox"/> SIP | <input type="checkbox"/> FIP |
| <input checked="" type="checkbox"/> Minor source NSR (45CSR13) | <input type="checkbox"/> PSD (45CSR14) |
| <input type="checkbox"/> NESHAP (45CSR15) | <input type="checkbox"/> Nonattainment NSR (45CSR19) |
| <input type="checkbox"/> Section 111 NSPS (Subpart(s) _____) | <input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____) |
| <input type="checkbox"/> Section 112(g) Case-by-case MACT | <input type="checkbox"/> 112(r) RMP |
| <input type="checkbox"/> Section 112(i) Early reduction of HAP | <input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e) |
| <input type="checkbox"/> Section 129 Standards/Reqts. | <input type="checkbox"/> Stratospheric ozone (Title VI) |
| <input type="checkbox"/> Tank vessel reqt., section 183(f) | <input type="checkbox"/> Emissions cap 45CSR§30-2.6.1 |
| <input type="checkbox"/> NAAQS, increments or visibility (temp. sources) | <input type="checkbox"/> 45CSR27 State enforceable only rule |
| <input type="checkbox"/> 45CSR4 State enforceable only rule | <input type="checkbox"/> Acid Rain (Title IV, 45CSR33) |
| <input type="checkbox"/> Emissions Trading and Banking (45CSR28) | <input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾ |
| <input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1) | <input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26) |
| <p>⁽¹⁾ If this box is checked, please include Compliance Assurance Monitoring (CAM) Form(s) for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why Compliance Assurance Monitoring is not applicable:</p> <p>NOT APPLICAPABLE, UNCONTROLLED EMMISIONS DO NOT MEET cam APPLICABLILITY STANDARDS.</p> | |

| 2. Non Applicability Determinations |
|--|
| <p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> |

Permit Shield Requested (not applicable to Minor Modifications)

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

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? Yes No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

Change Condition of 1.1 to include:

| Emission point ID | Emission Unit Description | Year Installed | Design Capacity | Control Device |
|-------------------|---------------------------|----------------|-----------------|----------------|
| TP-15-S | ARC CUTTER | 2015 | 15,000 lbs/hr | none |
| TP-16-S | ARC CUTTER | 2015 | 15,000 lbs/hr | none |
| TP-17-S | ACR CUTTER | 2015 | 15,000 lbs/hr | none |
| TP-18-S | ARC CUTTER | 2015 | 15,000 lbs/hr | none |

Change Condition 13.1.1 to include

| Source | PM | |
|------------------------------------|-------|------|
| | lb/hr | tpy |
| Arc Cutter (Emission Unit Tp-15-P) | 0.03 | 0.13 |
| Arc Cutter (Emission Unit TP-16-P) | 0.03 | 0.13 |
| Arc Cutter (Emission Unit TP-17-P) | 0.03 | 0.13 |
| Arc Cutter (Emission Unit TP-18-P) | 0.03 | 0.13 |
| Total | 0.12 | 0.52 |

Revise conditions 13.1.2 to:

| Source | Parameter | Limit |
|------------|-----------|-------|
| Arc Cutter | Rods used | 3660 |

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

| Permit or Consent Order Number | Date of Issuance | Permit/Consent Order Condition Number |
|--------------------------------|------------------|---------------------------------------|
| | MM/DD/YYYY | |
| | / / | |
| | / / | |

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

| Permit or Consent Order Number | Date of Issuance | Permit/Consent Order Condition Number |
|--------------------------------|------------------|---------------------------------------|
| | MM/DD/YYYY | |
| | / / | |
| | / / | |

6. Change in Potential Emissions

| Pollutant | Change in Potential Emissions (+ or -), TPY |
|-----------|---|
| PM | +0.52 |
| | |
| | |
| | |
| | |
| | |

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

7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)

Note: *This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows.*

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

| | | | |
|----------------|---|--------|---|
| (Signed): | <u>Tom Bell</u> <i>(Please use blue ink)</i> | Date: | <u>2015</u> / <u>9</u> / <u>2</u> <i>(Please use blue ink)</i> |
| Named (typed): | Tom Bell | Title: | Environmental Manager |

Note: Please check if the following included (if applicable):

- Compliance Assurance Monitoring Form(s)
- Suggested Title V Draft Permit Language

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

ATTACHMENT 3

Supporting Calculations for Emissions Estimates

Table 1
Arc-Cutting and Arc-Slicing Criteria Emission Estimates
Huntington Alloys Corporation, Huntington, West Virginia

| Process | Rod Weight ⁽¹⁾ (lbs) | Maximum Rod Usage ⁽¹⁾ (rods/hr) | Emission Factor ⁽²⁾ (lbs/1,000 lbs) | PM/P _{M10} Emission Estimates | |
|--------------|------------------------------------|--|---|---|--|
| | | | | Hourly Average ^(a) (lbs/hr) | Total Annual ^(b) (tons/yr) |
| Arc-Cutting | 0.15 | 20 | 10.1 | 3.0E-02 | 0.13 |
| Arc-Cutting | 0.15 | 20 | 10.1 | 3.0E-02 | 0.13 |
| Arc-Cutting | 0.15 | 20 | 10.1 | 3.0E-02 | 0.13 |
| Arc-Cutting | 0.15 | 20 | 10.1 | 3.0E-02 | 0.13 |
| Total | | | | 1.2E-01 | 0.53 |

Notes:

- (a) Hourly average emissions estimate (lbs/hr) = (Emission factor [lbs/1,000 lbs]) x (rod weight [lbs/rod]) x (maximum rod usage [rod/hr]) / (1,000)
- (b) Total annual emissions estimate (tons/yr) = (Emission factor [lbs/1,000 lbs]) x (rod weight [lbs/rod]) x (maximum rod usage [rod/hr]) x (tons/2,000 lbs) / (1,000) x (annual hours of operation [hrs/yr])
- Annual hours of operation (hrs/yr) = 8,760 (1)

References:

- (1) Information provided via Huntington Alloy email correspondence on October 25, 2013.
- (2) AP-42 Chapter 12.19, Table 12.19-1 "PM-10 Emission Factors for Welding Operations". Arc-cutting operations utilize copper-enriched nickel based alloy metal and arc-slicing operations assume E6011 steel alloy rods.

Table 2
Arc-Cutting and Arc-Slicing HAP Emission Estimates
Huntington Alloys Corporation, Huntington, West Virginia

| Pollutant | CAS | Arc-Cutting Emission Estimates | | |
|---------------------|-----------|--|---|--|
| | | Emission Factor ⁽¹⁾ (10 ⁻¹ lb/10 ³ lb) | Hourly Average ^(a) (lbs/hr) | Total Annual ^(b) (tons/yr) |
| Chromium | 7440-47-3 | -- | -- | -- |
| Cobalt | 7440-48-4 | -- | -- | -- |
| Manganese | 7439-96-6 | 8.48 | 2.5E-03 | 1.1E-02 |
| Nickel | 7440-02-0 | 16.92 | 5.1E-03 | 2.2E-02 |
| Total HAP Emissions | | -- | 0.0076 | 0.0334 |

Notes:

- (a) Hourly average emissions estimate (lbs/hr) = (Emission factor [10⁻¹ lbs/10³ lbs]) x (rod weight [lbs/rod]) x (maximum rod usage [rod/hr])
- (b) Total annual emissions estimate (tons/yr) = (Emission factor [10⁻¹ lbs/10³ lbs]) x (rod weight [lbs/rod]) x (maximum rod usage [rod/hr]) x (tons/2,000 lbs) x (annual hours of operation [hrs/yr])

| | | | |
|------------------------------------|---|-------|-----|
| Arc-Cutting Rod Weight (lbs) | = | 0.15 | (3) |
| Arc-Slicing Weight (lbs) | = | #REF! | (3) |
| Arc-Cutting Rod Usage (rods/hr) | = | 20 | (3) |
| Arc-Slicing Rod Usage (rods/hr) | = | #REF! | (3) |
| Annual hours of operation (hrs/yr) | = | 8,760 | (3) |

References:

- (1) AP-42 Chapter 12.19, Table 12.19-2 "Hazardous Air Pollutant (HAP) Emission Factors for Welding Operations". Arc cutting operations utilize electrode type En-Cu.
- (2) AP-42 Chapter 12.19, Table 12.19-2 "Hazardous Air Pollutant (HAP) Emission Factors for Welding Operations". Arc cutting operations utilize electrode type E6011.
- (3) See Table 1, Arc-Cutting and Arc-Slicing Criteria Emission Estimates.

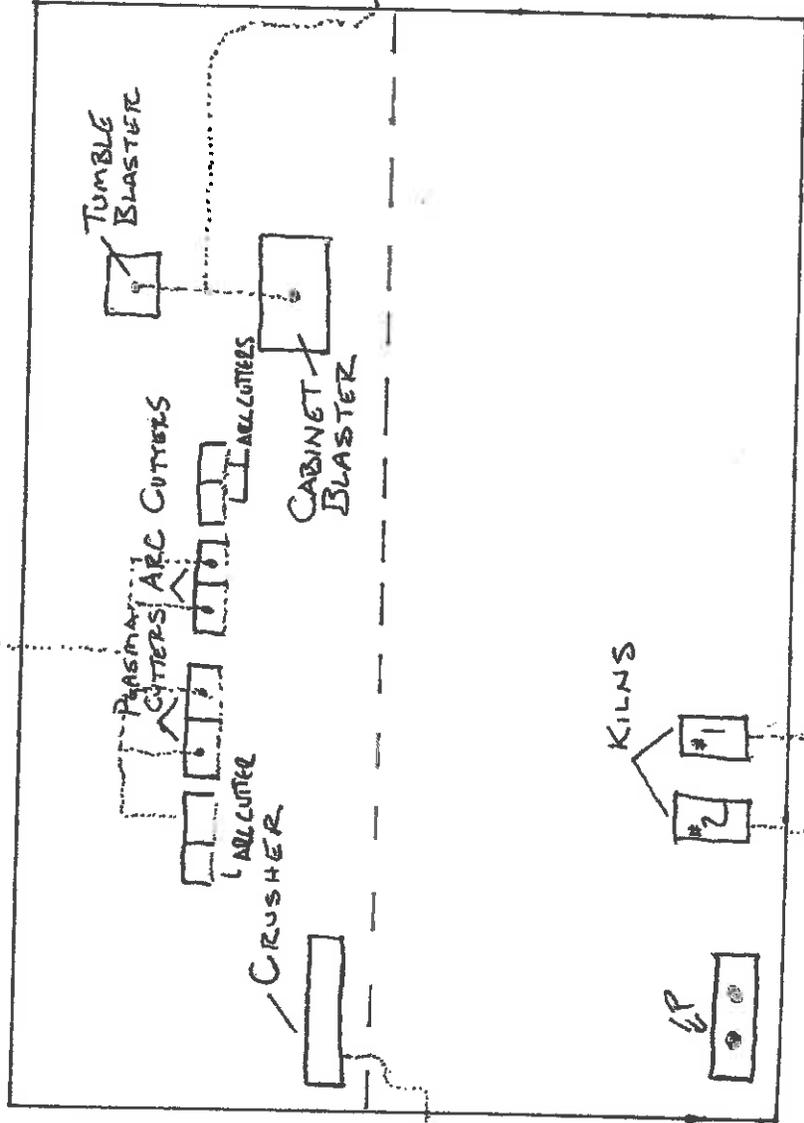
ATTACHMENT 4
Plot Plan

CALEDONIAN ALLOYS

TITLE V EMISSIONS

- TP-2-P
- TP-3-P
- TP-4-P
- TP-5-P
- TP-13-P
- TP-14-P
- TP-15-P
- TP-16-P
- TP-17-P
- TP-18-P

- TP-6-P
- TP-1-P
- TP-10-P
- TP-11-P
- TP-12-P



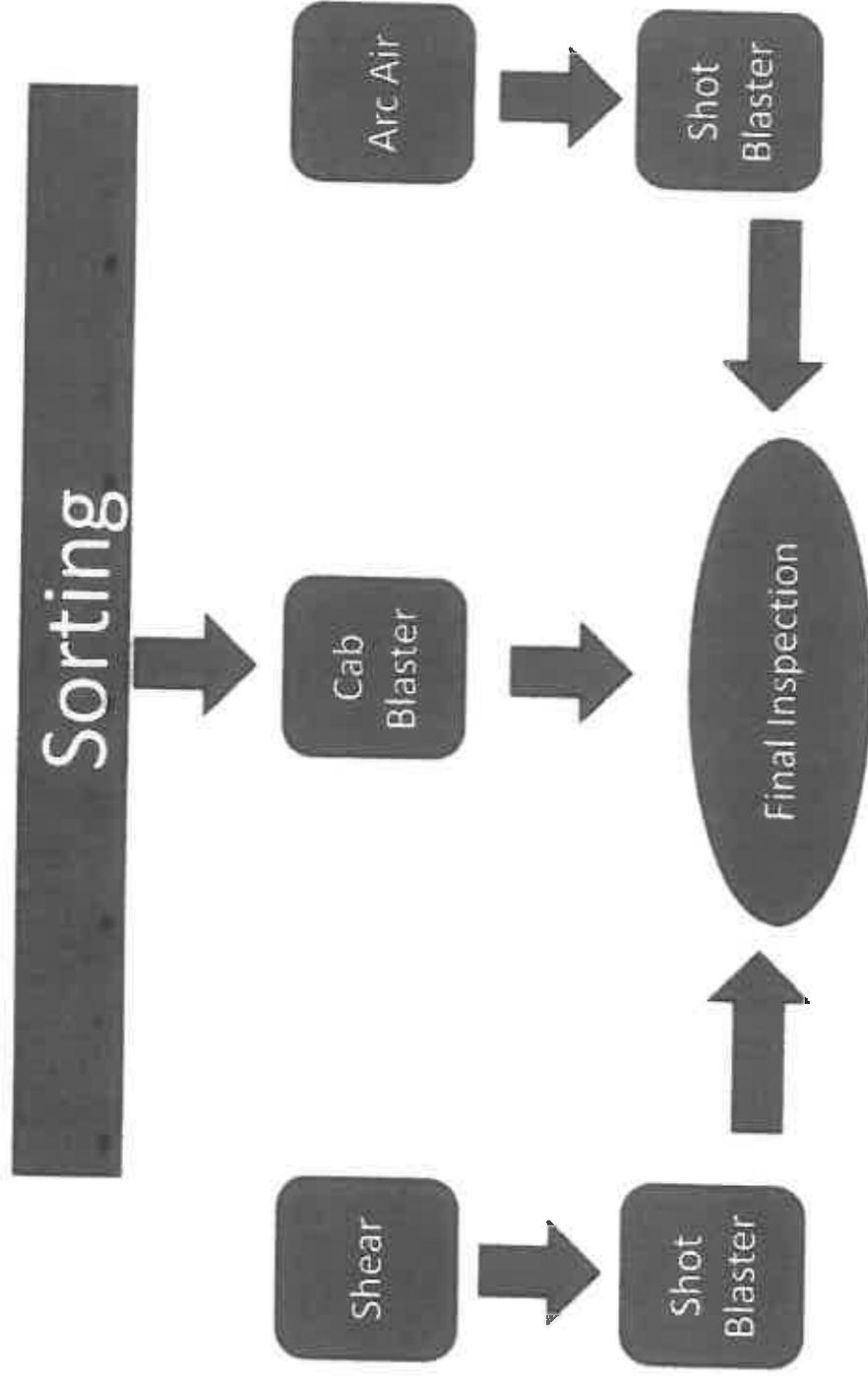
TP-9-P

TP-7A-P

TP-8A-P

ATTACHMENT 5
Process Flow Diagram

CAWV Revert Process Flow



ATTACHMENT 6
Business Certificate

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

ISSUED TO:
**HUNTINGTON ALLOYS CORPORATION
3200 RIVERSIDE DR
HUNTINGTON, WV 25705-1764**

BUSINESS REGISTRATION ACCOUNT NUMBER: **1007-8144**

This certificate is issued on: **06/10/2010**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with W.Va. Code § 11-12.*

*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 transferable 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 shall be considered a cessation of the business and a new certificate shall be required.

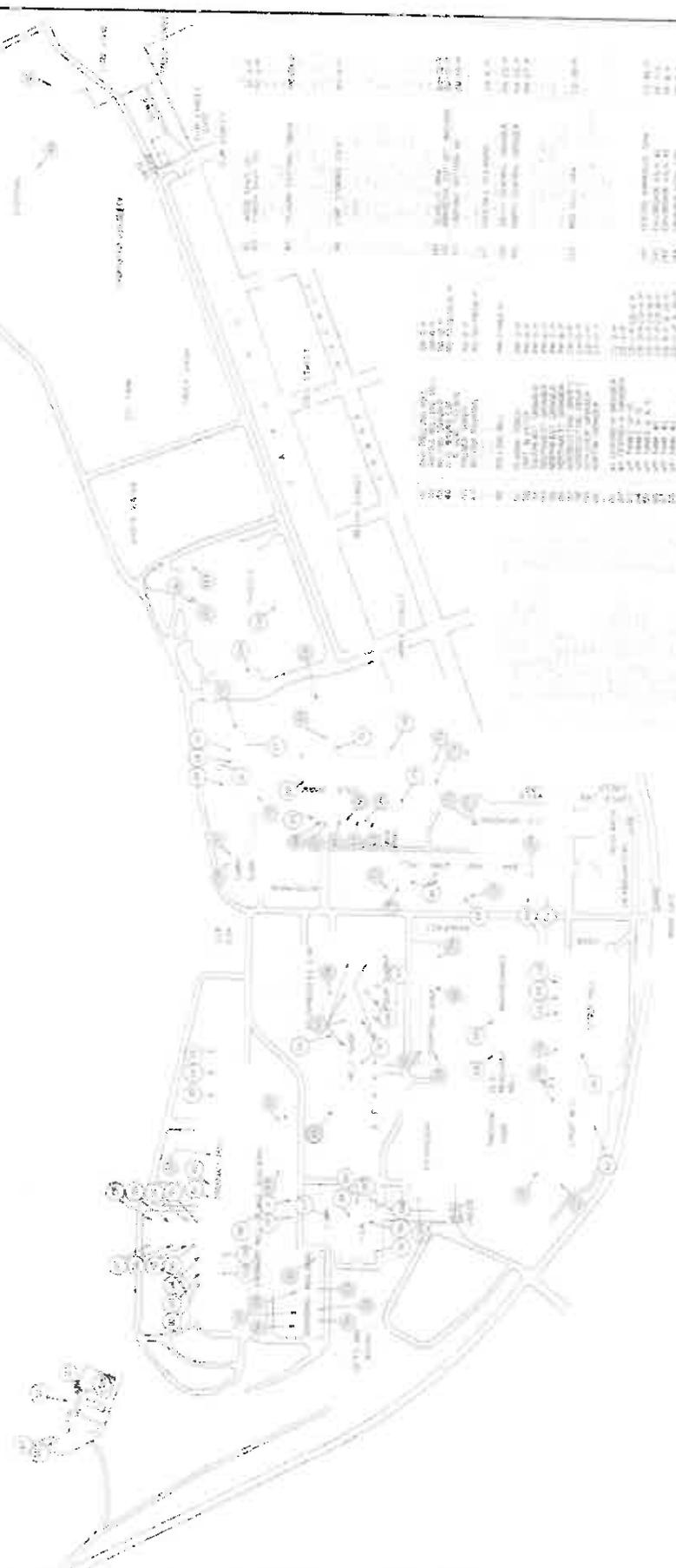
*TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of
this certificate displayed at every job site within West Virginia.*

ATTACHMENT 7

MAP

GENERAL METALS CORPORATION

INDUSTRIAL PLANT
 PRELIMINARY PLAN
 APPROXIMATE LAYOUT
 GENERAL PLAN



| NO. | DESCRIPTION | AREA (SQ. FT.) | VOLUME (CU. YD.) | EST. COST (\$) |
|--------------|-------------------|----------------|------------------|------------------|
| 1 | Foundations | 10,000 | 100 | 100,000 |
| 2 | Excavation | 20,000 | 200 | 200,000 |
| 3 | Structural Steel | 100,000 | 1,000 | 1,000,000 |
| 4 | Roofs | 100,000 | 1,000 | 1,000,000 |
| 5 | Interior Finishes | 100,000 | 1,000 | 1,000,000 |
| 6 | Exterior Finishes | 100,000 | 1,000 | 1,000,000 |
| 7 | Utilities | 100,000 | 1,000 | 1,000,000 |
| 8 | Site Work | 100,000 | 1,000 | 1,000,000 |
| 9 | Other | 100,000 | 1,000 | 1,000,000 |
| TOTAL | | 600,000 | 6,000 | 6,000,000 |

| NO. | DESCRIPTION | AREA (SQ. FT.) | VOLUME (CU. YD.) | EST. COST (\$) |
|--------------|-------------------|----------------|------------------|------------------|
| 10 | Foundations | 10,000 | 100 | 100,000 |
| 11 | Excavation | 20,000 | 200 | 200,000 |
| 12 | Structural Steel | 100,000 | 1,000 | 1,000,000 |
| 13 | Roofs | 100,000 | 1,000 | 1,000,000 |
| 14 | Interior Finishes | 100,000 | 1,000 | 1,000,000 |
| 15 | Exterior Finishes | 100,000 | 1,000 | 1,000,000 |
| 16 | Utilities | 100,000 | 1,000 | 1,000,000 |
| 17 | Site Work | 100,000 | 1,000 | 1,000,000 |
| 18 | Other | 100,000 | 1,000 | 1,000,000 |
| TOTAL | | 600,000 | 6,000 | 6,000,000 |

DATE: 10/15/54
 DRAWN BY: J. H. [Name]
 CHECKED BY: [Name]
 APPROVED BY: [Name]