

Fact Sheet



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

Permit Number: **R30-02900001-2011 (Part 1 of 3)**
Application Received: **November 30, 2010**
Plant Identification Number: **029-00001**
Permittee: **ArcelorMittal Weirton Inc.**
Mailing Address: **100 Pennsylvania Avenue, Weirton, WV 26062**

Revised: *N/A*

Physical Location: Weirton, Hancock County, West Virginia
UTM Coordinates: 533.70 km Easting • 4474.50 km Northing • Zone 17
Directions: From US 22 take Exit 2 to WV-2 North to Downtown Weirton. Continue on WV-2 approximately 3 miles. Approaching the 10th traffic light, at Pennsylvania Avenue, turn right into the driveway of the Mill Administration Building.

Facility Description

ArcelorMittal Weirton operates a steel finishing facility that includes a Strip Mill with steel pickling and cold rolling operations, Tin Mill with tempering and electrolytic plating (tin and chrome), Hydrogen Plant, and Boilers. Other operations at the facility include an emergency generator, storage tanks, wastewater treatment plants and support/maintenance shops. The facility also includes the following idled operations: Blast Furnaces, Basic Oxygen Plant, Continuous Caster, Sheet Mill, Hydrochloric Acid Regeneration Plant, and two Foster Wheeler Boilers.

For Title V purposes, the facility operations were divided into three parts: Part 1 includes the Boilers and emergency generator, Part 2 includes the Cold operations and hydrogen plant, and Part 3 includes the Hot operations. This permit covers Part 1 of the facility - Boilers and emergency generator. Facility operations are supported by three industrial boilers, High Pressure Boilers 3, 4, and 5. Boilers 3 and 4 are rated at 540 mmBtu/hr heat input and can fire natural gas, No. 6 fuel oil, and/or mixed gas (diluted natural gas - 70-75% natural gas + 25-30% air/oxygen). Boiler 5 is rated at 600 mmBtu/hr heat input and can fire natural gas and/or No. 6 fuel oil. All three boilers participate in the CAIR NO_x Ozone Season Trading Program.

Emissions Summary

Plantwide Emissions Summary - Parts 1 and 2 [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Year Actual Emissions
Carbon Monoxide (CO)	979.81	81.43
Nitrogen Oxides (NO _x)	2370.55	305.10
Particulate Matter (PM _{2.5})	453.16	19.40
Particulate Matter (PM ₁₀) <i>PM₁₀ is a component of TSP.</i>	632.52	29.89
Total Particulate Matter (TSP)	988.74	71.57
Sulfur Dioxide (SO ₂)	11,353.52	18.90
Volatile Organic Compounds (VOC)	83.09	27.58
Hazardous Air Pollutants	Potential Emissions	2010 Year Actual Emissions
Formaldehyde	1.43	0.188
Hydrochloric Acid	8.4	0.429
Chlorine	3.6	0.000
Chromium	1.36	0.341
Hexane	23.0	3.088
Nickel	2.63	0.030

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per of aggregate HAPs, therefore ArcelorMittal Weirton Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM emission limits
	45CSR6	Open burning prohibited
	45CSR10	SO ₂ emission limits
	45CSR11	Standby plans for emergency episodes
	45CSR30	Operating permit requirement.
	45CSR40	Control of ozone season NOx
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart DDDDD	Industrial Boiler MACT
	40 CFR Part 63, Subpart ZZZZ	Reciprocating Internal Combustion Engines
40 C.F.R. Part 82, Subpart F	Ozone depleting substances	
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to request any pertinent information such as annual emission inventory reporting is provided in WV Code § 22-5-4(a)(14). The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
CO7-1987	July 17, 1987	
CO-SIP-C-2003-28	July 30, 2003	

Determinations and Justifications

This is a permit renewal for this facility. The original permit was reopened October 2, 2007 to incorporate the CAIR permit requirements. The following changes have occurred since the most recent permit was issued:

Title V Boilerplate changes:

A new Section 1.2 Table was added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. The underlying authority for any conditions from R13, R14, and/or R19 permits have been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table. However, there are no permits currently associated with this Part 1 permit.

Conditions 3.1.1. and 3.1.2. were revised because the language in 45CSR§§6-3.1. and 3.2. changed.

Condition 3.1.3. citation was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.

Condition 3.3.1.d. was added.

Conditions 3.5.3.and 3.5.5. were revised to address electronic submittal of the annual certification to the USEPA. The certification shall now only be submitted to the USEPA by e-mail.

Other changes:

Old condition 3.1.9., related to the NO_x Budget Trading Program under 45CSR1, was removed since 45CSR1 was repealed and replaced with 45CSR40 - Control of Ozone Season NO_x emissions.

Old condition 3.1.10., related to the CAIR requirements under 45CSR40, was moved to Section 4.1.9. because it relates to the boilers. Old conditions 4.1.11. and 4.5.3., requiring the permittee to submit a CAIR permit application, were removed since the requirement has been completed. It was noted in the permit that CAIR will no longer be an applicable requirement after the effective date for the CSAPR, expected to be January 1, 2012.

Condition 4.1.2. referenced CO 11-1990, however as noted in the Fact Sheet for the Initial Title V Permit, CO 11-1990 was replaced by more stringent Consent Orders. However, there wasn't a specific requirement in the subsequent consent orders. Since 45CSR2 is more stringent, this reference was deleted.

The Foster Wheeler Boilers are permanently shut down, therefore any requirements for the Foster Wheeler Boilers were removed, including the requirements from NSR Permit R13-515, NSPS Subpart D, and the January 1995 Consent Order. The shutdown of the boilers is the reason for the reduction in potential emissions in the Plantwide Emissions Summary.

The test frequency table in Condition 4.3.2. was updated. Initial test results were eliminated since they have been completed, and the date and results of the most recent tests were noted. It was also noted that the test requirement can be suspended if the boilers combust natural gas or mixed gas only for the full test cycle, however testing must be done within 60 days of the combustion of fuel oil.

40 CFR Part 63, Subpart DDDDD (Boiler MACT). On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21, 2014. The 40 CFR Part 63, Subpart DDDDD, placeholder language was included as Condition 4.1.10.

On May 18, 2011, EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. This EPA action reads in part:

Issuance of a Stay and Delay of Effective Date

Pursuant to section 705 of the APA, the EPA hereby postpones the effectiveness of the Major Source Boiler MACT and the CISWI Rule until the proceedings for judicial review of these rules are complete or the EPA completes its reconsideration of the rules, whichever is earlier. By this action, we are delaying the effective date of both rules, published in the **Federal Register** on March 21, 2011 (76 FR 15608 and 76 FR 15704). The delay of the effective date of the CISWI Rule applies only to those provisions issued on March 21, 2011, and not to any provisions of 40 CFR part 60, subparts CCCC and DDDD, in place prior to that date. This delay of effectiveness will remain in place until the proceedings for judicial review are completed or the EPA completes its reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the **Federal Register** announcing that the rules are in effect.

40 CFR 63, Subpart DDDDD will not apply if the facility becomes a non-major source of HAPs prior to the first compliance date, however the facility will become subject to 40 CFR 63, subpart JJJJJ and the permittee shall apply for a permit modification.

40 CFR Part 63, Subpart ZZZZ - A Caterpillar emergency generator has been added to the equipment table. The diesel (CI) generator is greater than 500 hp and is at a facility that is major for HAPs. However, in accordance with Section 63.6590(b)(3), the emergency generator does not have to meet the requirements of Subpart ZZZZ or of Subpart A, including initial notification requirements as long as the conditions of Section 63.6640(f)(2) have been met. The conditions of Section 63.6640(f)(2) have been added to the renewal permit as Section 5.0.

Greenhouse Gas Permitting - This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

Non-Applicability Determinations

The following requirement has been determined not to be applicable to the subject facility due to the following:

40 CFR Part 64 - Compliance Assurance Monitoring. There are no control devices associated with the boilers or emergency generator, therefore this portion of the facility is not subject to CAM in accordance with 40 CFR § 64.2(a)(2).

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: August 15, 2011

Ending Date: September 14, 2011

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

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Facility comments: Requested deletion of new testing language in Section 3.3.1.d. (denied). Requested "in writing" be restored in Section 3.5.3. (denied). Requested deletion of LP boilers in Section 4.1.8.b. (approved) Requested notation in Sections 4.1.9. and 4.5.3. that CAIR will no longer apply after January 1, 2012 when CSAPR is to become effective (approved). Requested notation in Section 4.1.10. that 40 CFR 63, subpart DDDDD will not apply if facility becomes minor for HAPs before the first compliance date (approved, however 40 CFR 63, subpart JJJJJ will become applicable). Requested suspension of PM testing required in Section 4.3.2. if fuel oil is burned less than 50% of the time (denied). Requested updated Rule 2 and 10 monitoring plans be attached to the permit (approved).

EPA Comments:

The CAIR rule is scheduled to be replaced with the CSAPR rule on January 1, 2012. CSAPR will not be applicable to this facility. (The permit was changed to note CAIR will not apply after January 1, 2012).

The permit shield for Greenhouse Gas should be removed (permit shield was removed since it was not requested by the company)

The requirement to not burn coal conflicts with the Rule 10 monitoring plan, which lists coal as a backup fuel. (The Rule 2 and 10 monitoring plans were updated to eliminate burning of coal).