

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 2, 2012.

Permit Number: **R30-3300001-2012**
Application Received: **March 21, 2013**
Plant Identification Number: **03-54-033-00001**
Permittee: **GrafTech International Holdings, Inc.**
Facility Name: **Anmoore Facility/ Harrison County**
Mailing Address: **P.O. Box 120**
Anmoore, WV 26323

Permit Action Number: *SM02* Revised: *November 13, 2013*

Physical Location: Anmoore, Harrison County, West Virginia
UTM Coordinates: 561 km Easting • 4,345 km Northing • Zone 17
Directions: Rt 58, Phillippi Pike at Anmoore, WV.

Facility Description

GrafTech's Anmoore facility falls under the SIC code of 3624 for carbon and graphite products. This facility produces specialty carbon and graphite products by forming "green" carbonaceous shapes from raw materials consisting of petroleum coke and coal tar pitch. The "green" products are baked in natural gas fired, high temperature ovens and are then treated with liquid petroleum pitch and baked again prior to being processed into graphite using electrically heated furnaces. The graphite shapes are then purified, machined and processed into varying products which are further processed to enhance their properties prior to shipment. SIC Codes: 3624 - Electronic and Other Electrical Equipment & Components – Carbon and Graphite Products.

This modification is to remove the requirements for the packed bed scrubber (079) which is no longer in use.

Emissions Summary

The following changes in potential emissions will result from this modification:

<i>Pollutant</i>	<i>Change in Potential Emissions (+ or -), TPY</i>
HCl	+1.1
PM ₁₀	+0.73
PM _{2.5}	+0.73

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,910.31 TPY of carbon monoxide (CO), 197.245 TPY of particulate matter (PM₁₀), and 134.293 TPY of sulfur dioxide (SO₂). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, GrafTech 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	PM and Opacity Limits for Manufacturing Sources.
	45CSR13	NSR Permitting Requirements.
	45CSR30	Operating permit requirement.
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 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>)
R13-0874	09/16/1986	
R13-0893	11/20/1986	
R13-1151	10/26/1989	
R13-1540B	07/11/2005	
R13-1569A	07/20/1999	
R13-1934C	08/13/2013	

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2047	06/04/1997	
R13-2058C	06/06/2006	
R13-3039	04/09/2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes included in recently approved R13-1934C, were made to the Title V permit for this modification:

1. The Emission Point ID 079 and Emission Units listed under it were removed from the Emission Units table in section 1.1. This was done because scrubber 079 is no longer in service and its requirements were removed in R13-1934C which is the primary R13 permit for the given equipment. Note: Emission Point 079 is still listed in R13-1540B and R13-1569A. GrafTech plans to update both of these permits to remove 079.
2. In 7.1.3. and 7.1.4, Emission Point ID 079 was removed from the tables and citations since it is no longer in service. Although 079 has not been removed in R13-1540B and R13-1569A, removal of this equipment in the tables did not affect allowable emission limits.
3. Emission Point ID 079 was removed from the citations of conditions 7.1.7, 7.1.8, 7.3.1, 7.3.2, and 7.5.2 since it is no longer in service.
4. The Emission Point ID 079 was removed from the Title of Section 9.0.
5. Condition 9.1.1 was updated in accordance with condition 4.1.1 of R13-1934C.
6. A new condition 9.1.2 was added to include operating parameters for the packed-bed scrubber 055 from condition 4.1.2 in R13-1934C.
7. Conditions 9.1.2, 9.1.3, 9.1.4, 9.1.5, 9.1.6, 9.1.7, 9.1.8, 9.1.9, and 9.1.10 were removed to reflect changes made in R13-1934C.
8. Condition 9.1.11 was renumbered as 9.1.3 because of the removal of conditions 9.1.3 through 9.1.10.
9. Condition 9.2.1 language was updated to that contained in the corresponding R13-1934C condition 4.2.1.
10. The content of condition 9.3.1 was removed and changed to "reserved" to reflect changes made in R13-1934C.
11. Condition 9.3.2 was removed to reflect changes made in R13-1934C.
12. The content of condition 9.4.1 was removed and changed to "reserved" to reflect changes made in R13-1934C.
13. The citation in condition 9.4.2 was updated to reflect the changes to numbering in R13-1934C.

14. Condition 9.4.3's content was removed and changed to "reserved" since the corresponding condition was removed in R13-1934C.
15. Removed Emission Point ID 079 from the citations in conditions 9.4.4, 9.4.5, and 9.4.6 since emission point 079 was removed in R13-1934C.
16. Condition 9.5.1's content was removed and changed to "reserved" since the corresponding R13 condition was removed in R13-1934C.
17. The compliance plan in condition 9.6.1 was removed. The requirements of the compliance plan were satisfied with the submittal of the application for R13-1934C and R30-03300001-2012(SM02).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40CFR60 Subparts K, Ka, Kb—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978; prior to July 23, 1984; or after July 23, 1984 respectively.

Regardless of the construction date these NSPS standards have an applicability threshold of either 40,000 or 20,000 gallons in which GrafTech does not satisfy. The Company's largest volatile organic liquid tank is less than 10,000 gallons. Therefore, the above referenced NSPS are not applicable to the following tanks permitted herein:

10,000 gallon, Tectyl 779 Bulk Process Oil Tank, constructed in 1988, Emission Point ID (241)
6,000 gallon, Diesel Fuel Storage Tank, constructed in 1985, Emission Point ID (215)
1,000 gallon, Unleaded Gasoline Fuel Storage Tank, constructed 1985, Emission Point ID (216)
500 gallon, Kerosene Fuel Storage Tank, constructed 1985, Emission Point ID (217)

2. 40CFR60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Three of GrafTech's four boilers have the following characteristics:

Natural Gas Fired Boiler, Constructed in 1981, Rated capacity of 11.0 MMBtu/hr, ID (300)

Natural Gas Fired Boiler, Constructed in 1960, Rated capacity of 15.5 MMBtu/hr, ID (308)

Natural Gas Fired Boiler, Constructed in 1960, Rated capacity of 13.0 MMBtu/hr, ID (309)

As a result of these boilers being constructed before the corresponding applicability date of, June 9, 1989 the boilers listed above were found not subject to the said NSPS.

3. 40CFR63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters.

GrafTech is not a major source of Hazardous Air Pollutants at this time.

4. 40CFR63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers Area Sources.

Gas boilers are listed as being specifically exempt from these area source requirements under §63.11195(e).

5. 40CFR63, Subpart SSSSS – Refractory Ceramic MACT – GrafTech maintains the exemption criteria based on carbon and chromium content within their products. However, this MACT only affects major HAP sources, which GrafTech is not.

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: September 25, 2013
Ending Date: October 25, 2013

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
Robert.A.Mullins@wv.gov

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.

Response to Comments (Statement of Basis)

None.