

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 1, 2013.

Permit Number: **R30-01100007-2013**
Application Received: **June 8, 2015**
Plant Identification Number: **03-54-011-00007**
Permittee: **Huntington Alloys Corporation**
Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

Permit Action Number: MM03 Revised: *December 4, 2015*

Physical Location: Huntington, Cabell County, West Virginia
UTM Coordinates: 379.2 km Easting • 4252.30 km Northing • Zone 17
Directions: Interstate 64W to 29th Street Exit, go towards Huntington on Route 60 to
the Washington Blvd intersection. Make a right and go across
Washington Blvd bridge. Right turn on Riverside Drive. Enter plant
through Main Gate.

Facility Description

Huntington Alloys Corporation is a large rolling mill devoted exclusively to the production of wrought nickel and high nickel alloy products utilizing melting and remelting of metals to produce alloy ingots, hot and cold rolling, forging, drawing, machining, grinding, shot blasting, pickling, annealing, and ancillary testing and by-product recovery operations.

Proposed Modification

The permittee proposes to install four Arc Cutters (Emission Units: TP-15-P, TP-16-P, TP-17-P, and TP-18-P).

Emissions Summary

The proposed changes will result in the following changes in emissions:

Pollutant	Change in PTE (\pmtpy)
PM/PM10	+0.52
HAPs	+0.032

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 182.56 tons per year of CO, 636.89 tons per year of NOx, 1,093.76 tons per year of PM10, 190.78 tons per year of nickel, 56.01 tons per year of chromium, 20 tons per year of hydrochloric acid, and 272.76 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Huntington Alloys Corporation 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	Particulate Matter limits
	45CSR13	Construction Permits
	45CSR30	Operating permit requirement.

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

The Following is the only permit related to this modification.

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2532G	September 10, 2015	

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 were made to incorporate changes made to R13-2532F and R13-2532G.

Section 1.0

- Added four arc cutters (Emission Unit ID's: TP-15-P, TP-16-P, TP-17-P, and TP-18-P) to the Scrap Metal Recycling section of the Emission Units table.
- Updated the active permits table.

Section 13.0 Thistle Processing, LLC Requirements

- Added TP-13-P, TP-15-P, TP-16-P, TP-17-P, and TP-18-P to the emission unit list in the section title.
- Updated condition 13.1.1. to include the Arc Cutter sources TP-13-P, TP-15-P, TP-16-P, TP-17-P, TP-18-P and their respective PM limits.
- The new Arc Cutters are subject to 45CSR§7-4.1. The requirements of 45CSR§7-4.1 are streamlined with condition 13.1.1 and compliance is shown by meeting the hourly PM limits.
- In condition 13.1.2., the Arc Cutting limit was increased from 960 rods/day to 3360 rods/day to account for the rods used by the new arc cutters.
- The new arc cutters are subject to the opacity limit of 45CSR§7-3.1 which is contained in the existing condition 13.1.5.

Section 14.0 Recycled Scrap Metal Requirements

- Added TP-15-P, TP-16-P, TP-17-P, and TP-18-P to the emission unit list in the section title.
- Updated table in condition 14.1.4. to include the Arc Cutter sources TP-15-P, TP-16-P, TP-17-P, and TP-18-P.
- Updated condition 14.1.22 to include emission points TP-15-S, TP-16-S, TP-17-S, and TP-18-S.

Non-Applicability Determinations

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

None.

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: Not Applicable for minor modifications.
Ending Date: N/A

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
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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)

Not applicable.