

Fact Sheet



*For Draft/Proposed 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 August 8, 2007.

Permit Number: **R30-05300004-2007**
Application Received: **September 21, 2010**
Plant Identification Number: **03-54-05300004**
Permittee: **Felman Production, Inc.**
Mailing Address: **Route 3 Box 127 Letart, WV 25253**
Permit Action Number: *SM01* Revised: *Draft/Proposed*

Physical Location: New Haven, Mason County, West Virginia
UTM Coordinates: 419.73 km Easting • 4312.468 km Northing • Zone 17
Directions: Approximately 4 miles east of New Haven adjacent to US Route 33.

Facility Description

Felman Production, Inc. manufactures manganese and silicon based ferroalloys and is covered by Standard Industrial Classification (SIC) codes 3313 and 3341. The facility consists of three electric submerged arc furnaces, associated sizing equipment and environmental controls. This revision incorporates the addition of a 400 TPH portable crusher, 6 TPH baghouse dust Pelletizer and 20 TPH extrusion system and associated conveyor belts and stockpiles.

Emissions Summary

The increase in controlled emissions from the facility are described in the table below. It should be noted that an unknown fraction of the PM could be metal HAPs (mainly manganese compounds). Therefore in order to be conservative all PM is to be considered HAPs for the purposes of this permit.

	PM/Mn Compounds		PM ₁₀ /Mn Compounds	
	lb/hr	TPY	lb/hr	TPY
Crushing	21.8	2.45	10.31	1.16
Screening	21.8	2.45	10.31	1.16
Pelletizer	0.01	0.01	0.01	0.01
Extruder	0.39	0.10	0.18	0.05
Transfer Points	29.0	3.32	13.71	1.57
Stockpiles	3.36	0.61	1.59	0.29
Total	76.36	8.94	36.11	4.24

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the 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. 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, Felman Production, 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.

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

Federal and State:	45CSR13	Construction Permit
	45CSR30	Operating permit requirement.
	40 CFR Part 60, Subpart OOO	NSPS for Non-metallic Mineral Processing
	40 CFR Part 63, Subpart XXX	MACT for Ferroalloys Production

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>)
R13-2857	December 20, 2010	

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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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

This significant modification incorporates the new equipment permitted by NSR permit R13-2857, issued on December 20, 2010, into Section 6.0. of the Title V Permit. Emission limitations, monitoring and recordkeeping requirements established in R13-2857 were carried over into the Title V Permit.

Condition 6.1.1. - The PM emission limits are recorded in the NSR permit to inventory the emissions, and are calculated based on the maximum processing throughput and use of control devices for equipment. Limiting the throughput (Conditions 6.1.2. through 6.1.5.) and requiring the use of control devices (Conditions 6.1.10. through 6.1.13.) will demonstrate compliance along with recordkeeping (Conditions 6.3.5. through 6.3.7.) For stockpiles, emission limits are based on stockpile size and limiting stockpile size (Conditions 6.1.6. through 6.1.9.) shall demonstrate compliance.

Condition 6.1.10. - The baghouse efficiency shall be demonstrated with inspections and maintenance in accordance with Condition 6.1.17. and recordkeeping in accordance with Conditions 6.3.1. and 6.3.2.

Condition 6.3.5. requires monitoring and keeping records of the amount of material processed through the screen SC-1C to ensure compliance with the throughput limits for Crusher CR-1C and screen SC-1C. The material processed in SC-1C proceeds to CR-1C, therefore monitoring the throughput at SC-1C will be sufficient to monitor the throughput at CR-1C.

40 CFR Part 60, Subpart OOO - The crusher, screen and associated conveyor belts are subject to the Standards of Performance for Nonmetallic Mineral Processing Plants when processing limestone. The crusher and screen are subject to a limitation of 0.014 gr/dscf and must perform tests in accordance with 40 CFR §§ 60.8 and 60.675. The conveyor belts are subject to the 7% opacity limit and must perform tests in accordance with 40 CFR §§ 60.11 and 60.675. Monitoring, recordkeeping, and reporting requirements were also incorporated.

40 CFR Part 63, Subpart XXX - When not processing limestone, the crushing and screening equipment and associated fugitive dust sources are subject to 40 CFR Part 63, Subpart XXX. The crusher and screen are subject to a limitation of 0.022 gr/dscf. The facility was already subject to Subpart XXX before this modification and other applicable requirements were already listed the permit.

R13-2857, Condition 4.1.15. was combined with Condition 3.1.8. of the Title V Permit.

R13-2857, Condition 4.3.1. was combined with Condition 3.4.1. of the Title V Permit.

Non-Applicability Determinations

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

40 CFR Part 64 - None of the new emission units have potential pre-control device emissions of PM that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore, in accordance with 40 CFR § 64.2(a)(3), these units are exempt from CAM.

Greenhouse Gas Permitting - This modification does not trigger a PSD permit. In addition, this modification

only concerns emissions of PM, therefore it has been determined that there are no applicable GHG requirements.

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: January 19, 2011

Ending Date: February 18, 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: 304/926-0479

Response to Comments

Not applicable.