

Fact Sheet



For Proposed 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 October 31, 2008.

Permit Number: **R30-01100007-2008**
Application Received: **October 1, 2010**
Plant Identification Number: **03-54-011-00007**
Permittee: **Huntington Alloys Corporation**
Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

Permit Action Number: *MM01*; Revised: *Proposed*

Physical Location: Huntington, Cabell County, West Virginia
UTM Coordinates: 379.2 km Easting • 4252.30 km Northing • Zone 17
Directions: Interstate 64 W to 29th Street Exit, go towards Huntington on Route 60 to 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. This facility produces ingots, slabs, plate, sheet, strip, billets, rods, wire, pipe and tubing in approximately one hundred and twenty different alloys. It incorporates some two hundred manufacturing operations which include: 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.

This modification involves the installation of a new abrasive saw, which will be located on the East end of the Cold Draw Department. Alloy tubes, rods and rounds will be taken to the saw to be finish cut into customer specifications. The alloy will then be transported to the shipping center where it will be prepared for shipment.

Emissions Summary

Emissions associated with proposed changes:

Emission Point	Pollutant	Hourly Emissions (lb/hr)	Annual Emissions (tons/year)
CD-40-E Abrasion Saw	PM ₁₀	0.03	0.12

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, and 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 limits on manufacturing processes.
	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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2163A	December 20, 2010	

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.

Determinations and Justifications

This Title V minor modification incorporates the limitations, monitoring, recordkeeping, and reporting required by NSR permit R13-2163A. Permit R13-2163 was in the old format and Permit R13-2163A is in the new format, therefore citations in Section 5.0. of the Title V permit dealing with the Forge furnaces were updated.

R13-2163A, Condition 4.1.5. requires the permittee to limit the weight of alloy to be processed on a monthly rolling total basis, but the definition of monthly rolling total included the term "tons per hour". The term should have been "tons per month" and Condition 7.1.3. of the Title V Permit was changed to "tons per month".

R13-2163A, Conditions 4.2.1. and 4.2.2. require the permittee to inspect the associated baghouse and cyclone periodically and to perform corrective action as necessary to ensure effective operation. The phrase "as necessary" is not practically enforceable for Title V purposes, therefore it was replaced in the Title V Permit, Conditions 7.2.4. and 7.2.5. with the phrase "as expeditiously as possible".

R13-2163A, Condition 4.4.5. referred to the baghouse and cyclone inspections in Conditions 4.2.1. and 4.2.2. but included language associated with visual emissions checks such as weather conditions and Method 9. Because Conditions 4.2.1. and 4.2.2. of the R13 permit do not require visual emissions checks, this language was omitted from 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:

R13-2163A, Condition 4.5.1. required submittal of testing results within 60 days, however no testing was required in the permit. Therefore, this condition was not included in the Title V Permit.

R13-2163A, Condition 4.5.2. required reporting to the Director any visible emissions exceedances, however no Method 9 observations were required in the permit. Instead, the R13 permit relied on inspections of the control systems to ensure compliance. Because the emissions of the new abrasive saw are low, it was determined that the R13 monitoring and recordkeeping requirements were sufficient for Title V purposes, and Condition 4.5.2. was not included in the Title V Permit.

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: N/A

Ending Date: N/A

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, S.E.
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
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Charleston, WV 25304
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