

# 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 October 31, 2008.

Permit Number: **R30-01100007-2008**

Application Received: **July 30, 2010**

Plant Identification Number: **03-54-011-00007**

Permittee: **Huntington Alloys Corporation**

Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

Permit Action Number: *SM02*; Revised: *January 4, 2011*

---

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, producing ingots, slabs, plate, sheet, strip, billets, rods, wire, pipe and tubing. It incorporates 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 significant modification incorporates the equipment, emission limitations, monitoring and recordkeeping requirements related to Thistle Processing, LLC and authorized by Permit R13-2532C.

### Emissions Summary

The addition of the equipment authorized by Permit R13-2532C will increase PM emissions by 3.23 TPY.

### **Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit 173.35 tons per year of CO, 625.93 tons per year of NO<sub>x</sub>, 1088.23 tons per year of PM<sub>10</sub>, 190.78 tons per year of nickel, 56 tons per year of chromium, and 20 tons per year of hydrochloric acid. 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:	45CSR13	New Source Review permit
	45CSR30	Operating permit requirement

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**

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>	<b>Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)</b>
R13-0137	March 24, 1975	
R13-1165	November 3, 1989	
R13-1646	December 1, 1993	
R13-1767	October 17, 1994	
R13-2163	January 14, 1998	
R13-2532C	September 21, 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 in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### **Determinations and Justifications**

It was determined that Thistle Processing, LLC (Plant ID 011-00163) is a part of Huntington Alloys in accordance with the definition of a "Major source" as defined in 45CSR§30-2.26. Thistle Processing, LLC is authorized to operate by Permit R13-2532C. Emission limitations, monitoring and recordkeeping requirements established in R13-2532C were carried over into the Title V Permit. The PM emission limits are recorded in the NSR permit to inventory the emissions, the limits are very small and may be considered environmentally insignificant. Therefore, the only monitoring required will be monthly recordkeeping of operating hours and product throughput. Calculations from the NSR permit application show that limiting the operating hours and product throughput will result in the PM limits being met.

45CSR§7-4.1 applies to the Thistle Processing equipment, however the PM limits from the NSR permit are more stringent. Therefore, the requirement from 45CSR§7-4.1 was streamlined with the NSR PM limits.

### **Non-Applicability Determinations**

**40 CFR 64 - Compliance Assurance Monitoring (CAM)** - The emissions of criteria pollutants from the Thistle Processing equipment are limited by Permit R13-2532C, which makes them non-major sources, and exempt from CAM in accordance with 40 CFR § 64.2(a)(3).

### **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: November 17, 2010

Ending Date: December 17, 2010

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  
601 57th Street, S.E.  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478