

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 March 26, 2013.

Permit Number: **R30-05300004-2013**

Application Received: **January 24, 2013 (MM01) and April 19, 2013 (MM02)**

Plant Identification Number: **03-54-05300004-2013**

Permittee: **Felman Production, Inc.**

Mailing Address: **4442 Graham Station Road, Letart, WV 25253-8701**

Permit Action Number: *MM01 and MM02*

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, silicon based ferroalloys, and ferrosilicon 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 permit minor modification incorporates additional crushers and screening equipment as authorized by R13-2857B, as well as crushers, screening equipment and engines authorized by Temporary Permit R13-3073T.

Emissions Summary

The addition of the equipment authorized by Permit R13-2857B will increase the following emissions: PM - 20.22 tpy, PM₁₀ - 9.63 tpy, PM_{2.5} - 1.45 tpy.

The equipment authorized by R13-3073T will result in the following emissions increases: PM - 23.13 tpy, PM₁₀ - 11.06 tpy, PM_{2.5} - 1.75 tpy, SO₂ - 1.77 tpy, NO_x - 1.75 tpy, CO - 1.29 tpy, and VOC - 2.23 tpy.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility has the potential to emit 1,149 tons

per year of CO; 297 tons per year of PM₁₀; 1,205 tons per year of SO₂; 882 tons per year of VOCs, and 51 tons per year of Manganese. 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:	45CSR7	PM limits on manufacturing processes
	45CSR13	Construction Permits
	45CSR16	Performance Standards for New Stationary Sources
	45CSR30	Operating permit requirement
	45CSR34	Emissions Standards for HAPs
	40CFR part 60, Subpart IIII	Stationary Compression Ignition Engines NSPS
	40CFR part 63, Subpart XXX	Ferrous Alloys Production: Ferromanganese and Silico-manganese NESHAPs
	40 CFR Part 63, Subpart ZZZZ	Reciprocating Internal Combustion Engines NESHAPs
State Only:	None	

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>
CO-R7, 13, 16-93-1	April 16, 1993	CO-R7-95-13, Civil Action No. 94-C-1084
CO-R7-95-13, Civil Action 94-C-1084	April 20, 1995	
CO-R13-E-2012-11	June 12, 2012	
R13-2857B	August 9, 2013	
R13-3073T	June 5, 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.

Determinations and Justifications

This Title V minor modification incorporates the limitations and recordkeeping requirements authorized by NSR permit R13-2857B and Temporary Permit R13-3073T. The following changes have been made:

- The equipment table was updated with the new emission sources.
- The R13-2857B emission sources were added to the heading for Section 6.0.
- Conditions 6.1.21. through 6.1.26. were added to incorporate emission limits, throughput limits, control device requirements, and baghouse pressure drop requirements from R13-2857B.
- Conditions 6.3.9. and 6.3.10. were added to incorporate recordkeeping requirements from R13-2857B.
- Section 7.0 was added to incorporate the requirements from R13-3073T.
- Condition 7.1.3. (R13-3073T, Condition 4.1.3) changed Screen SC-1C to TMP-1S to correct a typo.
- The citations in Conditions 7.1.9. and 7.1.10. were changed to correct typos.

40 CFR 60, Subpart IIII - Both the crusher (E1) and screen (E2) engines are subject to this NSPS. The crusher engine is a 2013 271 hp Scania, and the screen engine is a 2007 129 hp Perkins. They are both non-emergency 2007 or later engines with a displacement of less than 10 liters per cylinder with a maximum power of less than 3,000 hp. The engines are subject to 40 CFR §60.4204(b), which refers back to 40 CFR §60.4201. For the screen engine, 40 CFR §60.4201 refers to 40 CFR §89.112 and requires a Tier 3 certification. For the crusher engine, 40 CFR §60.4201 refers to 40 CFR §1039.102. The crusher engine is an Interim Tier 4 ALT NO_x certified engine. The standards for these engines are listed in Condition 7.1.10. 40 CFR §60.4207(b) requires the operator to use diesel fuel which meets the requirements of 40 CFR § 80.510(b) and this requirement has been added as Condition 7.1.13. Conditions 7.3.8. and 7.3.9. were added to incorporate monitoring and compliance requirements from this rule.

40CFR 63 Subpart ZZZZ - The crusher and screen engines installed under R13-3073T are 271 hp and 129 hp, respectively, and are classified as new, non-emergency engines less than 500 hp. In order to comply with this rule the engines must meet the standards of 40 CFR 60 Subpart IIII as specified in 40 CFR §63.6590(c)(7). Because the engines must comply with 40 CFR 60 Subpart IIII requirements, the 40 CFR 63 Subpart ZZZZ reporting requirement in R13-3073T, Condition 4.4.2. was not incorporated into 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 60 Subpart OOO - The screens/crushers/conveyors are not subject because they do not process any “nonmetallic mineral” as defined in 40 CFR §60.671.

40 CFR 60 Subpart Y - The screens/crushers/conveyors are not subject because they do not process any coal.

Greenhouse Gas Permitting - This modification does not trigger a PSD permit and total CO₂e emissions from the new equipment are well below the threshold of 75,000 tpy, therefore, 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: N/A

Ending Date: N/A

Point of Contact

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

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: 304/926-0478
Bobbie.Scroggie@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

Not applicable.