West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: **R30-03500043-2013**
Application Received: **February 7, 2013**
Plant Identification Number: **035-00043**
Permittee: **Constellium Rolled Products - Ravenswood, LLC**
Mailing Address: **Route 2 South, Ravenswood, WV 26164**

Revised: N/A

Physical Location: Ravenswood, Jackson County, West Virginia
UTM Coordinates: 428.30 km Easting • 4,308.60 km Northing • Zone 17
Directions: Located along Century Road off of WV State Route 2 just south of Ravenswood.

Facility Description

Constellium Rolled Products – Ravenswood, LLC (CRP) is a secondary aluminum operation covered under SIC code 3353. This facility melts aluminum in 22 furnaces in the cast house. The metal is cast into ingot for further processing. From the cast house the aluminum is sent to the fabrication plant, which consists of hot rolling, cold rolling, plate, and general finishing. In fabrication, the metal is reheated to give it particular characteristics and rolled on one of the facility's hot or cold mills. After the metal has been finished into coil or plate it is warehoused and prepared for shipping to the customer.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	**Potential Emissions**	**2012 Actual Emissions**
Carbon Monoxide (CO)	519	63.20
Nitrogen Oxides (NO_X)	752	105.34
Particulate Matter ($PM_{2.5}$)	488	63.0
Particulate Matter (PM_{10})	488	63.0

Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Total Particulate Matter (TSP)	696	95.73
Sulfur Dioxide (SO_2)	7.7	4.51
Volatile Organic Compounds (VOC)	242	151.12

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	Year Actual Emissions
HCl	393	22.42
$C1_2$	0.1	0.1
HF	0.7	0.7

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of CO, NO_x, PM_{10}, and VOC; over 10 tons per year of HCl; and over 25 tons per year of aggregate HAPs (HCl, Cl_2, and HF). Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Constellium Rolled Products 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	PM and Opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs pursuant to 40 CFR 63.
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart RRR	Secondary Aluminum MACT
	40 CFR Part 63, Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT
	40 CFR Part 63, Subpart DDDDD	Boiler MACT
	40 CFR Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR 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 *(if any)*
R13-0017	January 10, 1974	N/A
R13-0072	May 23, 1974	N/A
R13-0383A	August 5, 2011	N/A
R13-2102	July 1, 1997	N/A
R13-2376C	December 19, 2005	N/A

Conditions from this facility's Rule 13 permits 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 permits. All other conditions from this facility's Rule 13 permits 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 is a permit renewal for this facility. The following changes have occurred since the most recent permit was issued:

Title V Boilerplate changes:

- Condition 3.1.3. citation was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.
- Condition 3.3.1.d. was added.
- Conditions 3.5.3. and 3.5.5. were revised to address electronic submittal of the annual certification to the USEPA. The certification shall now only be submitted to the USEPA by e-mail.

Other changes:

Melting Furnace DC-9A (005P115) has been dismantled and removed from the facility. Removed the furnace and the conditions associated with it from the Title V Permit. Modified Condition 4.1.15. to remove the furnace. The line in the table for total emissions was removed because the sums were listed in the NSR permit, and the sums would be inaccurate after the removal of Melting Furnace DC-9A and its emissions, therefore it was decided to remove the total emissions line to eliminate the discrepancy between the NSR permit and the Title V Permit.

Regulation 40 CFR Part 64 (Compliance Assurance Monitoring) - The Constellium facility has two demisters (007C101 and 007C102) that are potentially subject to the CAM regulation. These demisters would be subject when controlling emissions from the following sources:

1) 007C101 controlling the 72 Inch Single Stand Cold Mill 384 (007P101)
2) 007C102 controlling the 72 Inch Tandem Stand Cold Mill 382 (007P102)

Presently both of the Cold Mills are not operational. Title V Permit Condition 6.1.7 requires Constellium to develop and submit a CAM plan that meets the requirements of 40 CFR Part 64 at least 90 days prior to the proposed restart date of either piece of equipment. The requirements of the CAM plan will be submitted as part of a Title V Modification and Constellium cannot restart either piece of equipment until the Title V Permit

Modification has been approved.

40 CFR Part 63, Subpart ZZZZ (RICE MACT) - The facility is a major source of HAPs and has four existing emergency generators that are subject to the MACT. There are three 250 HP diesel generators and one 20 kW spark ignition generator. The requirements are listed in Section 9.0 of the Permit.

40 CFR Part 63, Subpart DDDDD (Boiler MACT) Requirements - Constellium has submitted a Notification that the following furnaces may be subject to the MACT: Walking Beam Furnace (006P102), Heat Soaking Pits (006P105), Reheat Furnaces (006P109), Ingot Pusher Furnace (006P119), Preheat Furnace (006P120), Cold Roll Annealing Furnaces (007P107), Salem 12 Zone Heat Treat Furnace (008P102), 120 Foot Aging Furnace (008P104), 60 Foot Aging Furnace (008P105), Horizontal Heat Treat Furnace (008P110), Horizontal Heat Treat Furnace Addition (008P112), Horizontal Heat Treat Furnace Addition #2 (008P113), Aging Furnace (008P111), Aging Furnace #2 (008P114), Coil Annealing Furnaces (009P103), Coil Annealing Furnaces (009P104)

These furnaces must comply with the MACT by January 31, 2016 in accordance with 40 CFR § 63.7495, unless an extension of compliance is granted. The Title V permit requires a submittal for a significant modification in accordance with the MACT rule. The 40 CFR part 63, subpart DDDDD placeholder language was added as Condition 3.1.8.

Non-Applicability Determinations

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

40 CFR Part 63, Subpart DDDDD (Boiler MACT) Requirements - The following Group 1 and Group 2 furnaces are exempt from the boiler MACT: Melting Furnace DC-1 (005P107), Melting Furnace DC-2 (005P108) Melting Furnace DC-7 (005P113), Melting Furnace DC-8 (005P114), Melting Furnace DC-9B (005P116), Melting Furnace DC-10A (005P139), Melting Furnace DC-10B (005P140), Holding Furnace 1 (005P117), Holding Furnace 2 (005P118), Holding Furnace 3 (005P119), Holding Furnace 5 (005P121), Holding Furnace 6 (005P122), Holding Furnace 7 (005P123), Holding Furnace 8 (005P124), Holding Furnace 9 (005P125), Holding Furnace 10 (005P141), Rotary Furnace (005P142), Induction Furnace East (005P104), Induction Furnace West (005P105), Melting Furnace DC-3 (005P109), Melting Furnace DC-5 (005P111), and Melting Furnace DC-6 (005P112). These furnaces are exempt in accordance with 40 CFR §63.7491(h) because they are subject to 40 CFR part 63, subpart RRR; and in accordance with 40 CFR §63.7575 because they are direct-fired and do not meet the definition of a process heater.

Greenhouse Gas Permitting - This is a second renewal Title V permit. There has been one significant modification that did not trigger a PSD permit. 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: July 2, 2013
Ending Date: August 1, 2013

Point of Contact

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
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

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)

No comments received.