

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: **February 16, 2010**
Plant Identification Number: **03-54-011-00007**
Permittee: **Huntington Alloys Corporation**
Mailing Address: **3200 Riverside Drive Huntington, WV 25705**

Permit Action Number: *SM01*; Revised: *April 13, 2010*

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 revises the CAM Plan for the PSEUs: MS-1A, MS-1B, MS-1D, and MS-1E. The baghouse pressure drop readings will now be averaged on a daily basis instead of no averaging period. Pressure readings will be checked daily for proper operations instead of checking pressure taps for pluggage. The baghouse pressure drop will now range from 2 to 8 inches of water, instead of 3 inches to 8 inches of water.

Emissions Summary

There are no emissions changes associated with these proposed changes.

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 carbon monoxide, 625.93 tons per year of nitrogen oxides, 1085 tons per year of PM₁₀, 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:	45CSR30	Operating permit requirement.
	40CFR Part 64	Compliance Assurance Monitoring

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>)
R13-0137	March 24, 1975	
R13-1165	November 3, 1989	
R13-1646	December 1, 1993	
R13-1767	October 17, 1994	
R13-2163	January 14, 1998	

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

40 CFR 64 - Compliance Assurance Monitoring (CAM) - #4 and #5 Electric Arc Furnaces (MS-1D and MS-1B), the Argon Oxygen Reactor (MS-1A), the Wire Feeder (MS-1E), and the Powder Torch (MS-2) each represent a pollutant specific emissions unit (PSEU) for PM. Emissions from the #4 and #5 Electric Arc Furnaces (MS-1D and MS-1B), the Argon Oxygen Reactor (MS-1A), and the Wire Feeder (MS-1E) are controlled by baghouses MS-1-C1 and MS-1-C2. In accordance with 40 CFR § 64.4(f), one CAM plan was submitted for these PSEUs. Emissions from the Powder Torch (MS-2) are controlled by baghouse MS-2-C.

Monitoring per the CAM Plan is identical for MS-1A, MS-1B, MS-1D, MS-1E, and MS-2. The CAM plan that was submitted did not allow for an averaging period for the baghouse pressure drop readings, required daily checks of pressure taps for pluggage, and required the pressure drop reading to be between 3 and 8 inches of water. The following is the revised CAM plan:

MS-1A, MS-1B, MS-1D, MS-1E, MS-2		Indicator No. 1	Indicator No. 2
I.	Indicator	Baghouse pressure drop	Inspection/Maintenance
	Monitoring Approach	Differential pressure drop through the baghouse is measured continuously (permit condition 6.2.3.)	Weekly inspection according to P/M checklist; maintenance performed as needed. (permit condition 6.2.4.)
II.	Indicator Range or Designated Condition	Pressure drop between 2 and 8 inches of water (permit condition 6.2.3.)	N/A
III.	Performance Criteria	Pressure drop across the baghouse is measured at the baghouse inlet and exhaust. The minimum accuracy of the device is 0.5% (permit condition 6.2.3.)	Inspections are performed at the baghouse. (permit condition 6.2.4.)
	A. Data Representativeness		
	B. Verification of Operational Status	N/A	N/A
	C. QA/QC Practices and Criteria	Pressure gauge calibrated quarterly. Pressure readings checked daily for proper operation. (permit condition 6.2.3.)	Qualified personnel perform inspection. (permit condition 6.2.4.)
	D. Monitoring Frequency	The pressure drop is measured continuously. (permit condition 6.2.3.)	Weekly inspections. (permit condition 6.2.4.)
	Data Collection Procedures	Record pressure drop readings continuously. (permit condition 6.4.3.)	Records are maintained to document weekly inspections and any required maintenance. (permit condition 6.4.4.)
	Data averaging periods	24 hours	None

Non-Applicability Determinations

No new non-applicability determinations have been made.

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: February 24, 2010

Ending Date: March 26, 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

Response to Comments

Not applicable.