

Fact Sheet



For Final 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 original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on January 4, 2006.

Permit Number: **R30-01900001-2006**

Application Received: **February 20, 2008**

Plant Identification Number: **003-054-019-00001**

Permittee: **West Virginia Alloys, Inc.**

Facility Name: **Alloy Facility**

Mailing Address: **Post Office Box 158, Route 60 East, Alloy, West Virginia 25002-0158**

Permit Action Number: MM01 Revised: October 28, 2008

Physical Location:	Alloy, Fayette County, West Virginia
UTM Coordinates:	4,220.96 km Easting • 476.01 km Northing • Zone 17
Directions:	Facility is located on the Kanawha River, approximately 30 miles southeast of Charleston, West Virginia, on U.S. Route 60.

Facility Description

West Virginia Alloys, Inc. (Alloy Facility) (SIC Codes 3313 and 4911) owns and operates a ferroalloy manufacturing plant producing silicon, ferrosilicon, slags, and other alloys near Alloy, Fayette County, West Virginia. Refer to the fact sheet for the initial Title V permit for more detail concerning the plant processes.

This minor modification reflects the changes in permit determination PD08-047. PD08-047 is for replacing Wet Scrubber (Emission Unit 0018) with a dry baghouse and the after the fact addition of a densification system to the existing Number 14 Silo, associated bagging line, and bulk truck loading, which occurred on August 1, 2006.

The alloy facility sold West Virginia Environmental Services (landfill) and no longer uses the landfill. Since the landfill is not used or owned by the Alloy facility, the landfill requirements were removed from the permit.

Emissions Summary

Plant-wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	No change
Nitrogen Oxides (NO _x)	No change
Particulate Matter (PM ₁₀)	PM ₁₀ decreased by 130.09 TPY
Total Particulate Matter (TSP)	No change
Sulfur Dioxide (SO ₂)	No change
Volatile Organic Compounds (VOC)	No change
Lead (Pb)	No change
<i>PM₁₀ is a component of TSP.</i>	
Hazardous Air Pollutants	Potential Emissions
2-Chloroaceteophenone	No change
Acetaldehyde	No change
Acrolein	No change
Arsenic Compounds	No change
Benzene	No change
Benzyl Chloride	No change
Bis(2-ethylhexyl)phthalate (DEHP)	No change
Bromomethane (methyl bromide)	No change
Cadmium compounds	No change
Carbon Disulfide	No change
Chloroform	No change
Chloromethane (methyl chloride)	No change
Chromium Compounds	No change
Cobalt Compounds	No change
Cyanide Compounds	No change
Dimethyl sulfate	No change
Ethyl Chloride	No change
Formaldehyde	No change
Hexane	No change
Hydrochloric Acid (HCl)	No change
Hydrofluoric Acid (HF)	No change
Isophorone	No change
Manganese Compounds	No change
Mercury Compounds	No change
Methyl Ethyl Ketone	No change
Methyl hydrazine	No change
Methyl tert-butyl Ether (MTBE)	No change
Methylene chloride	No change
Nickel Compounds	No change
Propionaldehyde	No change
Selenium Compounds	No change
Toluene	No change
<i>Some of the above HAPs may be counted as PM or VOCs.</i>	

Title V Program Applicability Basis

This facility maintains the potential to emit over 100 tons of Nitrogen Oxide, Particulate Matter, Carbon Monoxide, Volatile Organic Compounds, and Sulfur Dioxides. 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, West Virginia Alloys, 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.

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

Federal and State: 45CSR13 New Source Review permits for stationary sources
 45CSR30 Operating permit requirement.

State Only: None

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, 45CSR15, 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>)
R30-02300003-2006 (RE01)	October 10, 2007	PD08-047

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

The changes to the January 6, 2006 Title V Permit and Fact Sheet are R30-02300003-2006 (RE01) and permit determination (PD08-047).

1. R30-02300003-2006 (RE01) incorporated the applicable requirements from the Clean Air Interstate Rule (CAIR) 45CSR40 into the Title V permit.
2. The permit determination (PD08-047) had two changes that WV Alloys wanted incorporated in to the initial Title V permit.

- a. Replace the existing wet scrubber on the C3P multistage crusher with a Carbo-Tech Model 39-15-13-111945 TWH low temperature dust collector. The baghouse will operate at 60,000 cfm and is equipped with 585 Filterfab bags measuring 72" x 156". The baghouse has a control efficiency of 99.9 inches down to 1 micron. The replacement of the wet scrubber with the baghouse will result in a decrease in particulate emissions from the unit.
- b. The slurry truck operations at Silo 14 were replaced by bulk truck loading and loading to super sacks in 2006. These changes allow for the sale of the Silo 14 materials that were previously sent to a landfill. In the old slurry truck operation, dust from Silo 14 was dropped into a truck and then slurried in water for disposal. There was no control applied to that operation. The new bulk truck loading and the Apollo bagging operations transfer the Silo 14 dust with capture and control efficiencies, resulting in an overall decrease in particulate emissions.

The alloy facility sold West Virginia Environmental Services (landfill) and no longer uses the landfill. Since the landfill is not used or owned by the Alloy facility, the landfill requirements were removed from the Title V permit.

The additional changes to the January 4, 2006 Title V Permit and Fact Sheet are:

1. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
2. Removed the suffixes in the citations for permit R14-17B.
3. Updated the facility information and regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

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

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
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

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.