

# 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 Fact Sheet corresponding with the Title V operating permit issued on March 26, 2013.

Permit Number: **R30-05300004-2013**  
Application Received: **October 20, 2014 (MM03), June 22, 2015 (MM05)**  
Plant Identification Number: **03-54-053-00004**  
Permittee: **Felman Production, Inc.**  
Mailing Address: **4442 Graham Station Road, Letart, WV 25253-8701**

Permit Action Number: *MM03 and MM05* Revised *September 25, 2015*

---

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 R13-3217; adds an induction furnace, two hoppers and a conveyor as authorized by Temporary Permit R13-3244T; and removes screens and crushers no longer permitted by Permit R13-3073T.

### **Emissions Summary**

The addition of the equipment authorized by Permits R13-3217 and R13-3244T; and the removal of equipment no longer permitted by R13-3073T will result in the following emissions change:

Permit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
R13-3217	7.31 tpy	3.45 tpy	1.1 tpy
R13-3244T	10.19 tpy	4.82 tpy	1.52 tpy
R13-3073T	-23.13 tpy	-11.06 tpy	-1.75 tpy
<b>Total</b>	<b>-5.63 tpy</b>	<b>-2.79 tpy</b>	<b>0.87 tpy</b>

### 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; 295 tons per year of PM<sub>10</sub>; 1,205 tons per year of SO<sub>2</sub>; 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
	45CSR30	Operating permit requirement.
	45CSR34	Emissions Standards for HAPs
	40CFR part 63, Subpart XXX	Ferroalloys Production: Ferromanganese and Silico-manganese 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 (if any)
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	

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>	<b>Permit Determinations or Amendments That Affect the Permit (if any)</b>
R13-2857B	August 9, 2013	
R13-3217	April 29, 2015	
R13-3244T	June 10, 2015	

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," which may be downloaded from DAQ's website.

### Determinations and Justifications

This Title V minor modification incorporates the limitations and recordkeeping requirements authorized by NSR permits R13-3217 and R13-3244T. The following changes have been made:

- Updated the Equipment Table in Section 1.1. by renaming the equipment that has become permanent because of Permit R13-3217, removing the equipment no longer permitted by Temporary Permit R13-3073T, and adding equipment authorized by Temporary Permit R13-3244T.
- Updated the Active Permits Table in Section 1.2.
- Section 7.0., which incorporated the requirements from Permit R13-3073T, now incorporates the requirements from Permit R13-3217. Renamed the equipment that has become permanent and removed equipment that is no longer permitted from the heading and in the conditions. Updated the citations to R13-3217.
- Updated condition 7.1.6. to correspond to R13-3217, condition 4.1.6.
- Deleted emission limits for the engines in condition 7.1.1., the fuel consumption limit in condition 7.1.11., and the fuel consumption monitoring and recordkeeping requirement in condition 7.3.6. because they are no longer required in the NSR permit. Renumbered conditions 7.1.12., 7.1.13., and 7.3.7. through 7.3.9.
- Deleted R13-3073T citations from conditions 7.1.10. and 7.4.2. See Applicability Determination for 40 CFR 60 Subpart IIII below.
- Removed references to Temporary Equipment in conditions 7.1.11. (formerly 7.1.12), 7.3.2. and 7.3.3. and replaced with references to Equipment permitted under R13-3217.
- Added Section 8.0 for requirements from Permit R13-3244T.

40 CFR 63 Subpart XXX - National Emissions Standards for Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese - The crushing and screening equipment are subject to this MACT, which limits the equipment to PM emissions of 50 mg/dscm (0.022 gr/dscf). To demonstrate compliance, the permittee must perform initial testing in accordance with 40 CFR §63.1656, listed in condition 7.2.1.

40 CFR 60 Subpart IIII - during the review for Permit R13-3217, it was determined that Subpart IIII does not apply to the screen and crusher engines and the Subpart IIII requirements were not included in Permit R13-3217. In the definitions of Subpart IIII, it states that a stationary internal combustion engine is not a nonroad engine as defined at 40 CFR §1068.30. 40 CFR §1068.30 defines a nonroad engine as an internal combustion engine that by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. The engines are transportable and therefore meet the definition of nonroad engines. However, also in the definition of a nonroad engine in 40 CFR §1068.30(2)(iii), there is a stipulation that an internal combustion engine is not a nonroad engine if the engine remains or will remain at a location for more than 12 consecutive months. Since the engines have become permanent installations, they cannot be nonroad engines. Therefore, the requirements for 40 CFR Subpart IIII were kept in the Title permit, but the citations from R13-3017T were deleted.

#### **Non-Applicability Determinations**

The following requirement has been determined not to be applicable to the subject facility due to the following:

40CFR64 Compliance Assurance Monitoring - The crushing and screening equipment do not encompass any individual PSEU having pre-controlled emissions exceeding major source thresholds for Title V.

#### **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.