

Fact Sheet



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

Permit Number: **R30-03500002-2015**
Application Received: **January 5, 2015**
Plant Identification Number: **035-00002**
Permittee: **Century Aluminum of West Virginia, Inc.**
Facility Name: **Ravenswood Operations**
Mailing Address: **P.O. Box 98 Ravenswood, WV 26164-0098**

Revised N/A

Physical Location: Ravenswood, Jackson County, West Virginia
UTM Coordinates: 428.30 km Easting • 4308.6 km Northing • Zone 17
Directions: Facility located along Century Road (County Route 20/2) off of WV
State Route 2 just south of Ravenswood, Jackson County

Facility Description

Century Aluminum of West Virginia, Inc. (Century Aluminum) is a primary aluminum plant but has been inactive/shutdown since 2009. The aluminum facility consists solely of the reduction division. The reduction plant is made up of material handling/unloading, green carbon mixing/pressing, anode block baking, rodding, and electrolytic reduction.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	24,456	0
Nitrogen Oxides (NO _x)	74	0
Particulate Matter (PM _{2.5})	2,246	0
Particulate Matter (PM ₁₀)	2,246	0

Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Total Particulate Matter (TSP)	2,246	0
Sulfur Dioxide (SO ₂)	4,255	0
Volatile Organic Compounds (VOC)	67	0

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2014 Actual Emissions
Hydrogen Fluoride	219	0
Polycyclic Organic Material	15	0

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

Title V Program Applicability Basis

Due to this facility's potential to emit over 100 tons per year of CO, PM₁₀, and SO₂, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Century Aluminum 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:	45CSR2	PM limits on boilers.
	45CSR6	Open burning prohibited.
	45CSR7	PM limits on manufacturing processes.
	45CSR10	SO ₂ limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permits.
	45CSR16	New Stationary Source Standards.
	45CSR30	Operating permit requirement.
	45CSR34	Emissions Standards for HAPs.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 60, Subpart Dc	New Source Performance Standards for boilers.
	40 C.F.R. Part 63, Subpart LL	HAP Emission Standards - Primary Aluminum MACT.
	40 C.F.R. Part 63, Subpart DDDDD	HAP Emission Standards - Industrial Boilers MACT.
	40 C.F.R. 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 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>)
R13-0348	December 23, 1977	
R13-201R	June 10, 1997	
R13-2140A	August 29, 2003	
R13-2431A	March 17, 2009	

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 is a second renewal of the Title V permit. The facility has been inactive/shutdown since 2009. The following changes were made to the Title V permit:

Equipment Table - The Equipment Table was modified to remove the storage tanks because they have no applicable requirements. Also, the paint booth, 005P106, was removed from the Equipment Table because it has no applicable requirements. It is used for facility maintenance, not manufacturing or processing and is exempt from 45CSR§7-4.1 in accordance with 45CSR§7-10.3. Therefore, Conditions 7.1.3. and 7.4.1. were deleted.

Boiler No. 2 (005P102) has been permanently removed from service and has been removed from the Equipment Table, from the heading for Section 8.0., and from Conditions 8.1.2. and 8.1.6. Because the Hot Oil Heaters (002P139 and 002P140) are exempt from Conditions 8.1.2. and 8.1.6., and Boilers No. 4 and No. 5 (005P103 and 005P104) have more stringent PM and SO₂ limits from R13-2140, Conditions 8.1.2. and 8.1.6. have been deleted and the remaining conditions have been renumbered.

40 CFR Part 63 Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters - Hot Oil Heaters No. 1 and No. 2 (002P139, 002P140), and Boilers No. 4 and No. 5 (005P103, 005P104) are subject to MACT Subpart DDDDD. The affected sources must comply with the MACT no later than January 31, 2016. They meet the definition of existing boilers and process heaters (40 CFR §63.7490(d)). Because they fall under the subcategory of Units designed to burn gas 1 fuels (40 CFR §63.7499(1)), they are not subject to Tables 1, 2, 4, and 11 through 13 (40 CFR §63.7500(e)). The Hot Oil Heaters are less than 5 mmBtu/hr and must complete a tune-up every 5 years (40 CFR §63.7540). Boilers No. 4, and No. 5 must complete a tune-up annually (40 CFR §63.7540). Condition 8.1.14. was revised and Conditions 8.1.15., 8.3.3. and 8.5.3. were added to include the requirements for the MACT.

Streamlining language was added to Condition 9.2.8. to note that the Primary Aluminum MACT requirement for no visible emissions is more stringent than the 20% percent opacity limit from 45CSR§7-3.1.

Non-Applicability Determinations

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

45CSR5 - The facility is exempt from this rule in accordance with Section 2.4.a., a facility that is designed to process less than two hundred (200) tons of coal per day; and Section 2.4.b., a facility subject to the requirements of 45CSR2, 45CSR3, 45CSR7.

40 C.F.R. Part 60 subparts K, Ka, Kb - The facility does not have any tanks that store volatile organic liquids with a capacity greater than 65,000 gallons (Subpart K), 40,000 gallons (Subpart Ka), or 19,813 gallons (Subpart Kb).

40 C.F.R. Part 60 Subpart Y - The provisions of this subpart are not applicable because the facility does not process more than 181 Mg (200 tons) of coal per day.

40 C.F.R. Part 64 - Compliance Assurance Monitoring - This is a second renewal. Since CAM was addressed in the first renewal and there were no modifications to the facility that would have triggered a CAM review subsequent to the first renewal, a CAM evaluation was not 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, 2015

Ending Date: March 26, 2015

Point of Contact

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

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Division of Air Quality
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Charleston, WV 25304
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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)

Not applicable.