

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01100007-2024**
Application Received: **May 25, 2023**
Plant Identification Number: **03-54-011-00007**
Permittee: **Huntington Alloys Corporation**
Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

Physical Location: Huntington, Cabell County, West Virginia
UTM Coordinates: 379.2 km Easting • 4252.30 km Northing • Zone 17
Directions: Interstate 64W to 29th Street Exit, go towards Huntington on Route 60 to the 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. This facility produces ingots, slabs, plate, sheet, strip, billets, rods, wire, pipe and tubing in approximately 120 different alloys. It incorporates some two hundred 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	267.9	71.97
Nitrogen Oxides (NO _x)	314.6	83.01
Particulate Matter (PM _{2.5})	130.9	8.65
Particulate Matter (PM ₁₀)	130.9	21.80
Total Particulate Matter (TSP)	130.9	21.80
Sulfur Dioxide (SO ₂)	8.92	3.65
Volatile Organic Compounds (VOC)	51.0	8.45

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Nickel (Ni)	27.2	2.36
Chromium (Cr)	7.6	0.74
Hydrochloric Acid (HCl)	3.9	1.06
Hexane (C ₆ H ₁₄)	5.8	0

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

Title V Program Applicability Basis

This facility has the potential to emit 267.9 tons per year of CO, 314.6 tons per year of NO_x, 130.9 tons per year of PM₁₀ and 27.2 tons per year of nickel. 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, 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.

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	Permits for construction, modification, relocation and operation of stationary sources of air pollutants, notification requirements, administrative updates, temporary permits, general permits, permission to commence construction, and procedures for evaluation.
	45CSR16	Standards of performance for new stationary sources. (NSPS)
	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	HAP Emission Standards for Part 63 Sources
	40 C.F.R. 60 subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 subpart N	Chromium Electroplating MACT
	40 C.F.R. 63 subpart DDDDD	Boiler and Process Heater MACT
40 C.F.R. 64	Compliance Assurance Monitoring	
40 C.F.R. Part 82, Subpart F	Ozone depleting substances	
State Only:	45CSR4	No objectionable odors.
	45CSR§21-30	VOC limits

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>)
R13-0137	March 24, 1975	
R13-1165	November 3, 1989	
R13-1646A	March 5, 2015	
R13-1767	October 17, 1994	
R13-2163A	December 20, 2010	
R13-2532I	February 25, 2016	

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 the fourth renewal of the Title V Permit. There were no changes to the existing emission units and control devices, no changes to the approved compliance assurance monitoring (CAM) plans and Boiler B-1a-P, which was added to the facility, does not have emission controls. Therefore, there were no changes to CAM applicability or the existing CAM plans.

The following changes have occurred since the most recent Title V permit was issued:

Title V Boilerplate changes:

- **Condition 2.1.3.** – This condition was updated to delete the word “such” which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39. because the definition of “Secretary” was renumbered in a previous version of 45CSR30.
- **Condition 2.11.4.** - The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
- **Conditions 2.17., 3.5.7. and 3.5.8.a.1.** – These conditions were deleted and replaced with “Reserved” because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
- **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it was repealed.
- **Condition 3.5.3.** - The US EPA contact information and address were updated.
- **Condition 3.5.4.** – This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.

- **Condition 3.5.8.a.2.** – This condition was updated to replace the word “telefax” with “email” according to the change in 45CSR30 effective March 31, 2023.

Updated Permit Language Due to Rule/Regulation Language Changes:

- **Condition 4.1.8.b.** – This condition was amended to match updated 40 CFR 63 Subpart DDDDD. In the last sentence of the paragraph, the word “Tables” was added to the phrase “Tables 11 through 13” and then 13 was changed to 15.

Updated Permit Language to Correct a Typographical Error:

- **Condition 4.5.3.c.** – In the first sentence, a typo was corrected by changing “subpart DDDD” to “subpart DDDDD.”

Changes requested in the permit renewal application:

- **Condition 1.1.** – The Emission Unit table was updated to remove Main Boiler B-1-P and United Mill SM-4-P and add Boiler B-1a-P.
- **Condition 3.7.2.a.** – This condition was updated to remove the reference to Main Boiler B-1-P and correct the verb tenses in the sentence.
- **Conditions 4.0., 4.1.1., 4.1.2., 4.1.3., 4.1.5., 4.1.6., 4.1.8, 4.2.3.a., 4.4.1., 4.5.1. and 4.5.2.** – These conditions were updated to change the references for B-1-P to B-1a-P.
- **Condition 4.1.2.** – This condition was updated to change “9.54 pounds per hour” to “5.36 pounds per hour”.
- **Condition 4.1.4.** – This condition was updated to add the reference to B-1a-P in the citation.
- **Condition 4.1.6.** – This condition was updated to change “339.2 pounds per hour” to “190.4 pounds per hour”.
- **Condition 4.1.8.** – This condition was updated to include new Boiler B-1a-P. In the first sentence of the paragraph, the phrase “requirements for existing affected sources” was modified to “requirements for new and existing affected sources” and the phrase “or upon startup for new sources” was added to the end of the sentence. In the citation, the reference “40 CFR §§63.7495(b)” was changed to “40 CFR §§63.7495(a) and (b)”
- **Condition 4.2.1.** – This condition was updated to change the reference for “Main boiler” to “Boiler.”
- **Conditions 4.4.2. and 4.4.3** – These conditions from 40 CFR 60 Subpart Dc were added for Boiler B-1a-P. Since Boiler B-1a-P is natural gas fired, it is only required to maintain monthly fuel usage records.
- **Conditions 4.5.4. and 4.5.5** – These conditions from 40 CFR 60 Subpart Dc were added for Boiler B-1a-P.
- **Conditions 7.0 and 7.1.1.** – These conditions were updated to remove United Rolling Mill SM-4-P.

- **Appendix A / Regulation 2 Monitoring Plan** – This section was updated to change the reference for “B-1” to “B-1a”, for “Main Boiler” to “Boiler”, the MMBTU/HR from 80.0 to 33.5 and the Allowable Rate from 7.2 to 3.0 #/hr.
- **Appendix A / Regulation 10 Monitoring Plan** – The section was updated to change the reference for “B-1” to “B-1a”, for “Main Boiler” to “Boiler”, the MMBTU/HR from 80.0 to 33.5, the Allowable Rate multiplier from 0.09 to 3.2 to correct a typo and the Allowable Rate from 7.2 to 107.2 #/hr. For B-4 VIM Boiler, the Allowable Rate multiplier from changed from 0.09 to 3.2 to correct a typo and the Allowable Rate was changed from 2.3 to 83.2 #/hr.
- **Appendix A / Regulation 10 - Allowable Fuel Burning, SO₂ Stack Emission Rates** – The table was updated to change the reference for “B-1” to “B-1a”, for “Main Boiler” to “Boiler”, the MMBTU/HR from 80.0 to 33.5, the SO₂ Allowable lbs/hr from 248.0 to 107.2, the SO₂ Ton/yr from 0.160 to 0.068, the SO₂ Pound/Yr from 320 to 136 and the SO₂ Pound/Hr from 0.037 to 0.016. For VIM Boiler B-4, the SO₂ Allowable lbs/hr was changed from 80.6 to 83.2. In footnote **, the SO₂ multiplier was changed from 3.1 to 3.2 to correct a typo and now match 45CSR10 Subsection 3.3.f.

Non-Applicability Determinations

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

- a. 40 CFR Part 60 subpart Dc - The V.I.M. boiler was constructed before June 9, 1989 and has not been modified after that date. The CAP Salt Bath and West Pickle Salt Bath have capacities less than 10 mmBtu/hr.
- b. 40 CFR Part 60 subpart K - There are no tanks storing petroleum liquids at the Huntington Alloys facility that were constructed between June 11, 1973 and May 19, 1978 and are greater than 151,412 liters (40,000 gallons).
- c. 40 CFR Part 60, Subpart Ka - Some of the petroleum liquid storage tanks exceed the 151,416 liters (40,000 gallons) threshold capacity but are not subject to the standards because the vapor pressures of the storage tanks are less than the 10.3 kilopascal trigger listed in 40 CFR § 60.112a(a) and the 6.9 kilopascal trigger listed in 40 CFR § 60.115a(d)(1).
- d. 40 CFR Part 60, Subpart Kb - Some of the tanks storing volatile organic liquids have a capacity greater than 75 m³ and less than 151 m³, but are not subject to the provisions of this subpart because the vapor pressures of the tanks are less than the 15 kilopascal trigger listed in 40 CFR§ 60.110b(b).
- e. 40 CFR Part 60, Subparts AA, AAa and AAb - The #4 Electric Arc Furnace, #5 Electric Arc Furnace, and Argon Oxygen Reactor were installed in 1966, 1971, and 1971 respectively, before the applicability dates of these regulations (after October 21, 1974). Therefore, these regulations are not applicable to the facility.
- f. 40 CFR Part 63, Subpart CCC - HCl Pickling NESHAPS - This standard is not applicable to facilities that pickle specialty steel. Specialty steel means a category of steel that includes silicon electrical, alloy, tool, and stainless steels.
- g. 40 CFR Part 63, Subpart YYYYYY - This standard is applicable to area sources. Huntington Alloys is not an area source of HAPs.

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: April 5, 2024
Ending Date: May 6, 2024

Point of Contact

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

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41902
Daniel.p.roberts@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 (Statement of Basis)

Not applicable.