West Virginia Department of Environmental Protection
Division of Air Quality

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 13, 2018.

Permit Number: **R30-04900038-2018**
Application Received: **July 18, 2019**
Plant Identification Number: **049-00038**
Permittee: **Novelis Corporation**
Facility Name: **Fairmont Plant**
Mailing Address: **P. O. Box 912, Fairmont, WV 26555-0912**

Permit Action Number: *MM02* Revised: *January 6, 2020*

Physical Location:	Fairmont, Marion County, West Virginia
UTM Coordinates:	577.0 km Easting • 4372.00 km Northing • Zone 17
Directions:	From Charleston, WV, take I-79 to Fairmont, WV, to exit 137. Turn left at bottom of the ramp onto Route 310 West to Speedway Ave. Follow Speedway Ave. approximately 1.2 miles to plant. The Plant is on the left.

Facility Description

The Novelis Corporation Fairmont Plant (SIC: 3353) consists of an aluminum cold rolling mill, annealing furnaces, slitter lines, scrap bailer, food grade lubricant coating line, and equipment to recover coolant lubricant. The aluminum coils are received from off-site sources by truck and are rolled and/or re-rolled to a desired gauge, annealed to specified temper, coated and/or slit to desired width per customer specifications. Then the final product is packaged for shipment. The aluminum coils are transferred manually to and from each operation by overhead cranes or industrial trucks. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week for fifty-two (52) weeks a year.

The permittee is replacing two purge gas generators with two new, identically-sized generators.

Emissions Summary

This modification results in no emission changes.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 480 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Novelis 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:	45CSR7	To prevent and control particulate air pollution from manufacturing process operations
	45CSR30	Operating permit requirement.

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
None	N/A	

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

The permittee is replacing two purge gas generators as described in the table below:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Purge Gas Generators Being Replaced					
002-06	100 151 161 171 180	Purge Gas Generator #2 Manufacturer: Kemp Model: DCV-30 Serial Number: 2-1710	1985	30,000 ft^3/hr 262.8 X 10^6 ft^3/yr	N/A
002-07	100 151 161 171 180	Purge Gas Generator #3 Manufacturer: Sunbeam Model: LREX-15 Serial Number: F-06/07	1973	15,000 ft^3/hr 131.4 X 10^6 ft^3/yr	N/A
New Purge Gas Generators					
002-06	100 151 161 171 180	Purge Gas Generator #2 Manufacturer: SECO/WARWICK Model: LREX-30 Serial Number: 11618A	2019	30,000 ft^3/hr 262.8 X 10^6 ft^3/yr	N/A
002-07	100 151 161 171 180	Purge Gas Generator #3 Manufacturer: SECO/WARWICK Model: LREX-15 Serial Number: 11518A	2019	15,000 ft^3/hr 131.4 X 10^6 ft^3/yr	N/A

The new purge gas generators are identical in design capacities to the ones being replaced, and (as determined in PD19-041 on October 1, 2019) no NSR permitting was required. Apart from updating the emission units table, no revisions were made to the Title V permit as a result of this equipment change.

Non-Applicability Determinations

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

None

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:

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Division of Air Quality
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Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
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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.