

Fact Sheet



For Final Significant and Minor Modification Permitting Actions Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 15, 2018.

Permit Number: **R30-03500043-2018**
Applications Received: **November 12, 2019 and March 23, 2020**
Plant Identification Number: **035-00043**
Permittee: **Constellium Rolled Products Ravenswood, LLC**
Mailing Address: **P.O. Box 68, Ravenswood, WV 26164**

Permit Action Number: *SM01 and MM01* Revised: *July 20, 2020*

Physical Location: Ravenswood, Jackson County, West Virginia
UTM Coordinates: 428.30 km Easting • 4,308.60 km Northing • Zone 17
Directions: Located along Century Road off of WV State Route 2 just south of Ravenswood

Facility Description

Constellium Rolled Products Ravenswood, LLC (CRP) is a secondary aluminum operation covered under SIC code 3353. This facility melts aluminum in furnaces in the cast house. The metal is cast into ingot for further processing. From the cast house the aluminum is sent to the fabrication plant, which consists of hot rolling, cold rolling, plate, and general finishing. In fabrication, the metal is reheated to give it particular characteristics and rolled on one of the facility's hot or cold mills. After the metal has been finished into coil or plate it is warehoused and prepared for shipping to the customer.

The purpose of SM01 is the addition of chlorine fluxing to the SNIF In-line Fluxer (005Pxxx); this change was permitted in R13-2376E. The purpose of MM01 is the installation of two Diesel-Fueled Fire Pump Engines (FP001 and FP002); these engines were permitted in G60-D106.

Emissions Summary

This modification results in the following emission changes:

| Pollutant | Change in Potential Emissions (TPY) | | |
|------------------|-------------------------------------|-------|-------|
| | SM01 | MM01 | Total |
| NO _x | -0.21 | +0.61 | +0.40 |
| CO | -0.22 | +0.16 | -0.06 |
| VOCs | +0.01 | +0.02 | +0.03 |
| PM ₁₀ | +0.49 | +0.03 | +0.52 |
| SO ₂ | -0.01 | +0.22 | +0.21 |
| HCl | +5.11 | <0.01 | +5.11 |
| Formaldehyde | <0.01 | +0.01 | +0.01 |
| Other HAPs | -0.01 | <0.01 | -0.01 |
| Total HAPs | +5.10 | +0.01 | +5.11 |

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of CO, NO_x, PM₁₀, and VOC; over 10 tons per year of HCl; and over 25 tons per year of aggregate HAPs (HCl, Cl₂, and HF). 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, Constellium Rolled Products 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 for Manufacturing Processes |
| | 45CSR13 | NSR permitting |
| | 45CSR16 | New stationary sources |
| | 45CSR30 | Operating permit requirement. |
| | 45CSR34 | Emission standards for HAPs |
| | 40CFR60, Subpart IIII | CI RICE NSPS |
| | 40CFR63, Subpart RRR | Secondary Aluminum Production NESHAP |
| | 40CFR63, Subpart ZZZZ | RICE MACT |

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 (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-2376E | May 1, 2020 | |
| G60-D106 | January 10, 2020 | |

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

Equipment Changes

The following new items were added to the Emission Units Table:

| Emission Unit ID | Emission Point ID | Emission Unit Description | Year Installed | Design Capacity | Control Device |
|----------------------------------|-------------------|---|----------------|-----------------------------|--------------------|
| <i>Casting Department 005</i> | | | | | |
| 005Pxxx | 005S126 | SNIF In-line Fluxer | 2020 | 32.4 lb-Cl ₂ /hr | 005C105 Baghouse 4 |
| <i>Miscellaneous Sources 010</i> | | | | | |
| FP001 | FP001 | Clarke Fire Pump Driver/Model JWSH/UFAD80; diesel | 2020 | 422 HP | None |
| FP002 | FP002 | Clarke Fire Pump Driver/Model JWSH/UFAD80; diesel | 2020 | 422 HP | None |

Permit Changes Associated with SM01

To address the addition of chlorine fluxing to the SNIF In-line Fluxer (Emission Unit and Emission Point ID: 005Pxxx), the following changes were made to this Title V permit:

- New Condition 3.2.3. was added requiring a rolling 12-month total to be used to comply with all annual limits in R13-2376E.
- The SNIF In-line Fluxer was added to Conditions 4.1.2. and 4.1.3., which contains HCl emission limits from 45CSR7 in addition to PM, PM₁₀, CO, NO_x, SO₂, VOCs, and HCl emission limits from R13-2376E.
- The natural gas consumption limits in conditions 4.1.8., 5.1.5., and 7.1.3. were increased.
- "TSP" was changed to read "PM" in Condition 4.1.11.
- Condition 4.1.13. was revised. The following was added as new condition 4.1.13.: "The in-line fluxer shall not introduce more than 32.4 lb-Cl₂/hr into the aluminum charge, and HCl emissions generated by the in-line fluxer shall be controlled by the lime-injection Baghouse (Source

Identification Number 005C105).” The condition previously numbered as 4.1.13.b. was renumbered as condition 4.1.14.

- The HCl emission limit for the In-Line Fluxer was added to condition 4.1.14.
- Condition 4.1.16.d. was added to include PM emission limits from a group 1 melting/holding furnace processing only clean charge at a secondary aluminum production facility that is a major source.
- New Condition 4.1.17. was added to include HCl and PM emission limits for an in-line fluxer.
- Conditions 4.1.18 (formerly condition 4.1.16), 4.1.20 (formerly condition 4.1.18), 4.2.2, 4.2.8, 4.3.7, 4.3.10, 4.3.18.d, and 4.4.6.c.ii were updated to include 40 CFR 63, Subpart RRR requirements for an in-line fluxer.
- New Condition 4.1.23. was added to include monitoring and operating requirements for an in-line fluxer with emissions controlled by a lime-injected fabric filter.
- New Condition 4.1.24.b. was added to address corrective actions for a continuous opacity monitoring system.
- New Conditions 4.1.34, 4.2.17, 4.3.20, 4.4.7, and 4.5.7. were added requiring the permittee to comply with 45CSR7 and 40 CFR 63, Subpart RRR.
- New Conditions 4.2.9.d.-f. were added to address melting/holding furnaces subject to the clean charge emission standard and continuous opacity monitoring systems.
- Condition 4.3.19 was revised and states that the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in this permit and/or applicable regulations.
- New condition 4.3.21 was added to include 40 CFR 63 Subpart RRR testing requirements for an in-line fluxer.
- Title V Permit Condition numbering and regulatory citations were revised, as necessary.

Permit Changes Associated with MM01

The MM01 application was submitted for the installation of two Diesel-Fueled Fire Pump Engines (FP001 and FP002). These engines are subject to 40CFR60, Subpart IIII. Compliance with 40CFR60, Subpart ZZZZ is achieved by complying with 40CFR60, Subpart IIII, as stated in 40CFR§63.6590(c). The engines are fire pump engines with an engine displacement of less than 30 liters/cylinder that were manufactured after July 1, 2006. The engines are not equipped with diesel particulate filters. Several applicable requirements from 40CFR60, Subpart IIII were already included in this permit. However, the following new permit conditions were added:

| Title V Permit Condition | Summary of Permit Condition | Regulatory Citation | G60-D Condition |
|--------------------------|--|---|-----------------|
| 9.1.12. | Emissions standards from Table 4, of 40CFR60, Subpart IIII | 45CSR16; 40 CFR §60.4205(c) | 5.1.6. |
| 9.1.13. | Emission limits in condition 9.1.5 do not apply to startups and shutdowns. | N/A | 5.1.7. |
| 9.3.1. | Performance testing requirements | 45CSR16; 40 CFR §§60.4212(a), (b), (c), (e) | 5.4.1. |
| 9.4.5. | Records of maintenance for each emergency generator | N/A | 5.3.2. |

The following additional permit changes were made as part of MM02:

- Previously, this permit referenced G60-C. However, this permit has been updated to G60-D. Therefore, all references to G60-C were changed to G60-D, and individual citations to permit conditions in G60-D were revised, as necessary.
- Several conditions that contained applicable requirements for fire pump engines were already included in this permit. The citations were updated to reference the new engines and G60-D106, as necessary.
- NO_x, CO, and VOC emission limits for the fire pump engines were added to condition 9.1.5.b.

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: June 2, 2020

Ending Date: July 2, 2020

Point of Contact

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

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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41252 • Fax: 304/926-0478
Rex.E.Compston@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.