

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Reopening, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 5, 2017.

Permit Number: **R30-02900001-2017**

Date of Reopening: **January 31, 2018**

Plant Identification Number: **03-54-029-00001**

Permittee: **ArcelorMittal Weirton LLC**

Mailing Address: **100 Pennsylvania Avenue, Weirton, WV 26062**

Permit Action Number: *RE01* Revised *May 14, 2018*

Physical Location:	Weirton, Hancock County, West Virginia
UTM Coordinates:	533.70 km Easting • 4474.50 km Northing • Zone 17
Directions:	From US 22 take Exit 2 to WV-2 North to Downtown Weirton. Continue on WV-2 approximately 3 miles. Approaching the 10th traffic light, at Pennsylvania Avenue, turn right into the driveway of the Mill Administration Building.

Facility Description

ArcelorMittal Weirton LLC operates a steel finishing facility that includes a Strip Mill with steel pickling and cold rolling operations, Tin Mill with tempering and electrolytic plating (tin and chrome), Hydrogen Plant, and Boilers. Other operations at the facility include emergency generators, storage tanks, wastewater treatment plants and support/maintenance shops.

This permit is being reopened to correct a typographical error in Section 3.5.6. and to incorporate updated recordkeeping requirements for the Continuous Annealing Lines and Anneals 8, 9, 10, and 11 in Section 4.4.

Emissions Summary

There are no emission increases associated with this reopening.

Title V Program Applicability Basis

With the proposed changes associated with this reopening, this facility maintains the potential to emit 211.78 tons per year of Carbon Monoxide and 235.99 tons per year of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, ArcelorMittal Weirton LLC 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 reopening to this permit has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM emission limits
	45CSR30	Operating permit requirement
State Only:	N/A	

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>)
CO-SIP-C-2003-28	July 30, 2003	
R13-0032C	February 9, 2016	
R13-3075	August 13, 2013	

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

Upon issuance of the renewal permit on April 5, 2017, ArcelorMittal Weirton LLC filed an appeal of the permit. The company had submitted comments on the draft/proposed permit and although the comments were addressed, the DAQ's response to the company's comments was inadvertently not sent to the company. The DAQ's response to comments was sent to the company during the appeals process and after the company reviewed the DAQ's response, the company determined that many of the issues that were raised in the appeal were addressed by DAQ's response. The company and DAQ worked to find a resolution to the following remaining issues:

Section 4.4.1. - The company did not agree with the recordkeeping requirement for the facility's twelve jumbo annealing furnaces (056/1, 057/1, and 058/1), which was combined with the recordkeeping requirement for the continuous annealing furnaces (061/1 and 062/1). The Design Heat Input (DHI) of the jumbo anneals was listed as 10 mmBtu/hr each, which makes 45CSR§2-8.3.c. an applicable requirement. However, 45CSR§2A-7.1.a.1., which is an applicable requirement for the continuous annealing furnaces, should not apply to the jumbo annealing furnaces because 45CSR§2A-3.1. states the rule applies to fuel burning units having a DHI over 10 mmBtu/hr.

Documentation sent to DAQ on October 11, 2017 by the facility shows the DHI of Furnaces No. 1 through No. 7, and No. 12, to be 9.4 mmBtu/hr. 45CSR§2-11.1. exempts fuel burning units with a DHI under 10 mmBtu/hr from Sections 4, 5, 6, 8 and 9 of 45CSR2. Therefore, the recordkeeping requirement for these furnaces was deleted. The DHI of Furnaces No. 8, 9, 10, and 11 are 10 mmBtu/hr, therefore a revised recordkeeping condition was added as Section 4.4.2. which requires the facility to maintain records of the operating schedule and quantity of fuel consumed on a semi-annual basis and cites 45CSR§2-8.3.c. only.

Section 4.4.1., which cites 45CSR§2-8.3.c. and 45CSR§2A-7.1.a.1., was revised by specifying that it applies to the continuous annealing lines 2 and 3, and removing the reference to the jumbo annealing furnaces in the citation.

These changes will reduce the burdensome requirement of keeping records on 14 separate furnaces, will not increase emissions, and will make the permit more accurate.

40 CFR 63 Subpart ZZZZ - *National Emission Standards for Reciprocating Internal Combustion Engines (RICE)*. The company did not agree with the applicability of requirements for the Caterpillar emergency engine located at the facility. The requirements were changed for the renewal permit based on changing the designation of the facility from a major source to an area source of HAPs. The Caterpillar engine is an existing emergency CI engine greater than 500 HP. At a facility that was major for HAPs it had no requirements from Subpart ZZZZ. When the facility was designated as an area source, the engine became subject to the area source requirements under Subpart ZZZZ, The company agreed to the determination and the area source requirements from 40 CFR 63 Subpart ZZZZ were not changed.

Condition 3.5.6. contained a typographical error and was revised.

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: Tuesday, March 27, 2018

Ending Date: Thursday, April 26, 2018

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

No comments received.