

Fact Sheet



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

Permit Number: **R30-01100007-2018**

Application Received: **April 30, 2018**

Plant Identification Number: **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	2017 Actual Emissions
Carbon Monoxide (CO)	182.6	73.96
Nitrogen Oxides (NO _x)	636.9	84.02
Particulate Matter (PM _{2.5})	1093.9	13.80
Particulate Matter (PM ₁₀)	1093.9	37.33

Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Total Particulate Matter (TSP)	1278.4	37.33
Sulfur Dioxide (SO ₂)	8.92	5.92
Volatile Organic Compounds (VOC)	53.9	23.04

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
Nickel	190.8	10.58
Chromium	56.0	3.69
Hydrochloric Acid	20.0	0.48
Hexane	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 182.6 tons per year of CO, 636.9 tons per year of NO_x, 1093.9 tons per year of PM₁₀, 190.8 tons per year of nickel, 56 tons per year of chromium, and 20 tons per year of hydrochloric acid. Due to this facility's potential to emit over 100 tons per year of 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	Construction permits
	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 CFR Part 61	Asbestos inspection and removal
	40 CFR 63 subpart N	Chromium Electroplating MACT
	40 CFR 63 subpart DDDDD	Boiler and Process Heater MACT
	40 CFR 64	Compliance Assurance Monitoring
	40 CFR 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 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR 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 (if any)
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 a third renewal of the Title V Permit. The following changes have occurred since the most recent Title V permit was issued:

Title V Boilerplate changes: Conditions 3.5.3., 3.5.5., and 3.5.6. were changed to require electronic submittal of reports.

40 CFR 63, Subpart DDDDD: Huntington Alloys has four boilers and four heaters that must comply with the requirements of the Industrial, Institutional, and Commercial Boiler and Process Heater MACT. Natural gas fired boilers and heaters do not have emission limitations but do have work practice requirements. All furnaces are in the units designed to burn gas 1 fuels subcategory. Boilers B-1-P and B-4-P are greater than 10 mmBtu/hr each and are subject to Table 3, condition 3, requiring a tune-up of the boilers annually. Boilers SM-5-P and CD-32-P are between 5 mmBtu/hr and 10 mmBtu/hr each and are subject to Table 3, condition 2, requiring a tune-up of the boilers biennially. Heaters TP-7B-P, TP-8B-P, TP-11-P, and TP-12-P are considered new, are below 5 mmBtu/hr and are subject to Table 3, condition 1, requiring a tune-up every 5-years. Permit condition 4.1.8. was revised and conditions 4.2.3., 4.5.3., 14.1.25., 14.2.11., and 14.5.3. were added to incorporate the requirements from the MACT. Old condition 4.1.8.b. was deleted since the NOCS has been submitted. The heaters were required to have a one-time energy assessment (Table 3, condition 4) and this has been conducted and notification submitted.

40 CFR 63, Subpart N: Updated conditions 12.1.3 and 12.1.4. to match updated 40 CFR 63 subpart N. Condition 12.2.1 was changed to reference and cite 40 CFR §63.343(c)(3) because the packed bed scrubber system has composite mesh. It was discovered that the packed bed scrubber system has always had composite mesh, therefore the permit was changed. Condition 12.3.1. was expanded to list the testing requirements that were incorporated by reference in the previous permit.

Non-Applicability Determinations

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

- a. 40CFR Part 60 subpart Dc - The Main Boiler and V.I.M. boiler were constructed before June 9, 1989 and have not been modified after that date. The CAP Salt Bath and West Pickle Salt Bath have capacities less than 10 mmBtu/hr.
- b. 40CFR 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 151m³, 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 and AAa - 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: Wednesday, October 10, 2018

Ending Date: Friday, November 9, 2018

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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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.