

Fact Sheet



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

Permit Number: **R30-01100009-2021**

Application Received: **June 5, 2020**

Plant Identification Number: **011-00009**

Permittee: **Steel of West Virginia, Inc.**

Mailing Address: **2nd Avenue and 17th Street, Huntington, WV 25726**

Physical Location:	Huntington, Cabell County, West Virginia
UTM Coordinates:	375.03 km Easting • 4253.77 km Northing • Zone 17
Directions:	From Charleston, travel west on I-64 to Exit 15. Turn right on US-60 for 5.3 miles. US-60 is 3 rd Avenue in Huntington. Turn right onto 17 th Street.

Facility Description

Steel of West Virginia (SWVA), Inc. manufactures hot rolled steel products covered by Standard Industrial Classification (SIC) Code 3312. The facility has the potential to operate 24 hours per day, 7 days per week, 52 weeks per year. The facility consists of two electric arc furnaces (EAFs), a continuous caster and caster cutoff torches, scrap preparation torches, and ladle preheaters. The manufacturing steps include melting scrap steel, casting billets, re-heating and hot rolling the billets, shot blasting, welding, punching and shearing.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2019 Actual Emissions
Carbon Monoxide (CO)	335.11	251.00
Nitrogen Oxides (NO _x)	247.12	137.83
Particulate Matter (PM _{2.5})	84.16*	57.91*
Particulate Matter (PM ₁₀)	94.37*	62.26*
Total Particulate Matter (TSP)	131.00*	81.75*
Sulfur Dioxide (SO ₂)	35.78	28.47
Volatile Organic Compounds (VOC)	31.26	18.73

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions
Cadmium Compounds	0.04	0.02
Chromium Compounds	0.08	0.06
Formaldehyde	0.11	0.04
Hexane	2.07	0.84
Manganese Compounds	2.40	1.54
Other HAPs	0.55	0.34
Total HAPs	5.24	2.84

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

**Filterable+ Condensable*

Title V Program Applicability Basis

This facility has the potential to emit 335.11 tons per year of Carbon Monoxide and 247.12 tons per year of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, SWVA, Inc. 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	Pre-construction permits
	45CSR16	New Source Performance Standards
	45CSR21-19	Coating of Miscellaneous Metal Parts
	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	Emissions Standards for HAPs
	40 CFR Part 60, Subpart JJJJ	NSPS for Spark Ignition engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart ZZZZ	MACT for Reciprocating Internal Combustion Engines
	40 CFR Part 63, Subpart YYYYYY	MACT for area sources: Electric Arc Furnace Steelmaking Facilities
	40 CFR Part 63, Subpart CCCCCC	MACT for Gasoline Dispensing Facilities
State Only:	40 CFR Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR21-30	Solvent Metal Cleaning

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>)
R13-0834	April 1, 1986	

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

There were no significant changes to the facility or processes during the previous permit term, nor to the existing applicability of the rules. Only the following changes were made to the permit during this renewal:

1. Emission Units Table 1.1 – removed Lime Bin #2 Load-In (Emission Unit EU004), also emission unit “EU004” was removed from the permit throughout; re-named control devices for emission units EU003, EU006, EU007 and EU008; and added control device Wheelabrator / Auxiliary Baghouse CE007 for emission Units EU003 and EU008.
2. Section 3.0 – facility-wide conditions 3.1.11 and 3.5.10 were deleted because the rule 45CSR29 (Emission Statements for VOCs and NO_x) has been repealed.
3. Section 4.0 – removed former recordkeeping requirement 4.4.3 added to the permit on July 10, 2006 during SM01 as a compliance demonstration for the exception from the 20% opacity limit (per 45CSR§7-3.2, condition 4.1.1.a) for Electric Arc Furnaces #1 and #2 (Emission Units EU006 and EU007): “*The owner or operator shall maintain daily records of the time and duration of each charge; and the time and duration of each tap. [45CSR§30-5.1.c (EU006, EU007)]*”. The rest of the requirements of Section 4.0 were re-numbered to reflect the change. The recordkeeping requirement 4.4.3 should have been removed after a more stringent opacity limit of 6% applicable to the furnaces was added to the permit on August 17, 2010 during a permit renewal process (per 40CFR63 Subpart YYYYY §63.10686(b)(2), condition 4.1.11.b.2), but it was overlooked then. Compliance with the 6% opacity is demonstrated as per monitoring requirement 4.2.1.
4. Section 7.0 – monitoring requirements for emergency generator EU034 (7.2.2.c.2) and emergency generators EU035 and EU036 (7.2.4.2) were revised to delete vacated sections of 40 CFR Part 60, Subpart JJJJ (§60.4243(d)(2)(ii) and (iii)), and 40 CFR Part 63, Subpart ZZZZ (§63.6640(f)(2)(ii) and (iii)), therefore conditions 7.2.2.c.2(ii), (iii) and 7.2.4.2(ii), (iii) were removed from the permit. Also, an applicable reporting requirement 7.5.1 for emergency generators EU035 and EU036 was added (40 CFR Part 60, Subpart JJJJ §60.4245(e)). A typo was corrected in condition 7.2.3 – section 7.2.3.3 was removed because it was repeating section 7.2.3.2.

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 AA and AAa - The existing EAFs and associated baghouses were constructed prior to October 21, 1974. Work was performed on the EAFs in 1979, however the work did not meet the definition of "modification" or "reconstruction" as determined in the July 10, 2006 significant modification.
- b. 40 CFR Part 60, Subparts K, Ka, Kb - The facility does store petroleum-based liquids in fixed roof storage tanks, however there are no tanks with capacities greater than 65,000 gallons (Subpart K), 40,000 gallons (Subpart Ka), or 75 cubic meters (Subpart Kb).
- c. 40 CFR Part 63, Subpart DDDDD - The facility does not meet the definition of a major source of HAPs
- d. 40 CFR Part 63, Subpart FFFFF - The facility does not meet the definition of a major source of HAPs.
- e. 40 CFR Part 63, Subpart MMMM - The facility does not meet the definition of a major 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: February 5, 2021
Ending Date: March 8, 2021

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41250
natalya.v.chertkovsky@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.