

Fact Sheet



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

Permit Number: **R30-04900038-2023**

Application Received: **August 3, 2022**

Plant Identification Number: **049-00038**

Permittee: **Novelis Corporation**

Facility Name: **Fairmont Plant**

Mailing Address: **1800 Speedway Avenue, Fairmont, WV 26554**

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 aluminum cold rolling mills, 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	14.6	3.31
Nitrogen Oxides (NO _x)	19.3	3.94
Particulate Matter (PM _{2.5})	22.7	1.99
Particulate Matter (PM ₁₀)	22.7	1.99
Total Particulate Matter (TSP)	22.7	1.99
Sulfur Dioxide (SO ₂)	0.11	0.02
Volatile Organic Compounds (VOC)	480	215.95

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Arsenic	<0.01	0
Benzene	<0.01	0
Beryllium	<0.01	0
Cadmium	<0.01	0
Chromium	<0.01	0
Cobalt	<0.01	0
Dichlorobenzene	<0.01	0
Formaldehyde	0.02	0
Hexane	0.3	0
Manganese	<0.01	0
Mercury	<0.01	0
Naphthalene	<0.01	0
Nickel	<0.01	0
Polycyclic Organic Matter	<0.01	0
Selenium	<0.01	0
Toluene	0.42	0.23
Total HAPs	0.74	0.23

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

Title V Program Applicability Basis

This facility has 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. To prevent and control particulate air pollution from manufacturing process operations Standby plans for emergency episodes. NSR Permitting The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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>)
R13-2268B	April 2, 2008	

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 have been two minor modifications done to the permit since the previous permit renewal:

- MM01 (issued 10/29/2018) to separate the exhausts from the annealing furnaces and created three new stacks. However, the changes permitted via MM01 never took place at the facility. The modification was requested due to safety concerns, but Novelis determined the existing stacks (Emission Points IDs 100 and 180) were sufficient

for handling the exhaust from the annealing furnaces, so, there were no new stacks added to the facility. Therefore, the three new stacks created during MM01 (Emission Points IDs 151, 161 and 171) were removed from the Emission Units Table 1.1 and from the title of Section 5.0.

- MM02 (issued 01/06/2020) was issued to replace the two purge gas generators with new ones. Per the Consent Order CO-R13-E-2019-8 (issued August 23, 2019), Order For Compliance Section, item 1, the company was required to submit a permit determination form (PDF) for the installation of the two purge gas generators to replace the two existing purge gas generators (#2 and #3, Emission Units ID 002-06 and 002-07) within 15 days of the effective date of the Consent Order. The PDF was submitted on September 4, 2019. The Permit Applicability Determination PD19-041 was issued on September 10, 2019 with a "No Permit Needed" decision. Therefore, per the CO-R13-E-2019-8, Other Provisions Section, item 7.a, this Consent Order was terminated on October 15, 2019.

Additionally, there are no new air pollution rules that apply to this facility, nor any changes to the existing rules. Therefore, the only additional changes made to the permit with this renewal are formatting/boilerplate changes and correction of typos.

Non-Applicability Determinations

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

- a. 45CSR§10-5.1—*To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*. The processes at this facility do not meet the definition of refinery process gas streams or any other process gas streams that contains hydrogen sulfides to be combusted.
- b. 45CSR21—*To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*. This rule does not apply since the facility is not located in any of the counties specified in this rule.
- c. 40 CFR 60, Subparts K, Ka, and Kb—*Standards of Performance for Storage Vessels*. There are no tanks that were constructed between June 11, 1973 and July 23, 1984 (Subparts K and Ka). There are no tanks that were constructed after July 23, 1984 that are greater than 75 m³ (Subpart Kb).
- d. 40 CFR 60, Subpart TT—*Standards of Performance for Metal Coil Surface Coating*. This rule does not apply since this facility is no longer engaged in metal coil surface coating.
- e. 40 CFR 63, Subpart SSSS—*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil*. This rule does not apply since this facility no longer engages in metal coil surface coating.
- f. 40 CFR 64—*Compliance Assurance Monitoring*. This is the fourth permit renewal for this facility. It was determined not to be subject to this rule in the past. The new purge gas generators #2 and #3 installed in 2019 are identical in design capacities to the ones being replaced, and they do not have control devices. Therefore, this facility remains not subject to CAM in accordance with 40 C.F.R. §64.2(a)(2).

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: April 7, 2023

Ending Date: May 8, 2023

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)

Although there were no comments received during the "Draft" public comment period or during the "Proposed" EPA comment period, a revised version of WV Rule 30 (45CSR30) became effective on March 31, 2023. Due to the Rule 30 revisions, the Title V boilerplate has been revised. Consequently, the revisions have been made to the final permit. The revisions to the permit are as follows:

- **Condition 2.1.3** - The section of Rule 30 that defines Secretary changed in a previous version of Rule 30 and we failed to update this condition. Also, in the recently revised Rule 30, the word "such" was removed.
- **Conditions 2.17, 3.5.7, and 3.5.8.a.1** - The section for Emergency was removed and replaced with Reserved in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
- **Condition 3.5.4** - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
- **Condition 3.5.8.a.2** - Under the revised Rule 30, "telefax" was replaced with "email".