Lane Regional Air Pollution Authority
1010 Main Street
Springfield, Oregon 97477

Title V Operating Permit Review Report

Globe Metallurgical, Inc.
1801 Aster Street
Springfield, Oregon 97477

INTRODUCTION:

1. This Title V permit is a new operating permit. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION:

2. Globe Metallurgical, Inc. manufactures silicon metal from quartz, coal, woodchips, and other raw materials, in electric arc furnaces at several locations in the United States. This permit is required for Globe's Springfield , Oregon facility in accordance with 40 CFR 70.

FACILITY DESCRIPTION:

3. The Globe Metallurgical, Inc. facility produces high purity silicon metal in an 18 megawatt (MW) submerged arc, open top electric furnace. The furnace operates continuously 24 hours per day with the exception of shutdown periods for maintenance and repair. Projected uptime is 99 percent with the remaining 1% of the time used for maintenance. The process is a reduction smelting operation using the following raw materials: quartz, coal, coke, woodchips, lime, and other minor ingredients. Raw materials are stored in outdoor piles from which they are conveyed to a mix house for weighing and blending and are then transferred to hoppers above the furnaces. The mix is gravity fed through a chute. Carbon electrodes are suspended vertically and submerged into the furnace. At high temperatures in the reaction zone, the carbon sources react with silicon dioxide gas to form silicon and carbon monoxide.

   Nitrogen oxides, sulfur dioxide, carbon monoxide, volatile organic compounds, and particulate are emitted from the furnace. Particulate is controlled via a dedicated baghouse. Molten product is tapped from the furnace through a tap hole located at the bottom of the furnace at hearth level. Once full, the ladle is moved to a refining area and then molten metal is poured into molds. Cooled metal is removed from the molds and transferred to crushing and sizing operations. Product is crushed to a specified size and then packaged for shipment. Fume and dust generated throughout the process are collected, densified or pelletized and sold, recycled, or disposed of.

4. The source is located in a nonattainment area for PM_{10} and this source is a large (> 100 tons per year) source of this pollutant. The Eugene-Springfield area is in attainment for all other pollutants.

5. The source is located within 100 kilometers (62 miles) of three Class I Wilderness air quality protection areas:

Mt. Washington, Three Sisters, and Diamond Peak Wilderness areas.

6. A Land Use Compatibility Statement dated 12/13/96 and signed by the City of Springfield grants unconditional approval for the facility.

7. The source also holds a Landfill Permit No. 1120, NPDES No. 0100-J, Gravel Mining Permit No. 1000, and Stormwater Permit No. 1200H.

8. The proposed Title V operating permit will supplement the existing Prevention of Signification Deterioration (PSD) permit which was written to accommodate the Globe proposal to install a second furnace at the facility. Globe has since withdrawn the plans to install a second furnace at the Springfield, Oregon facility.

9. Since the PSD ACDP was issued on June 4, 1998 this facility has been inspected 3 times and found to be in compliance twice. The 10/18/99 inspection resulted in a notice of non-compliance for failure to install required (Condition 30 of the PSD ACDP) alarms on baghouse pressure drop monitoring systems. The alarms were installed by early 2000. The ranges of pressure drops (EALs) proposed in the application materials for this Title V permit indicate that the facility baghouses do not operate in the range of pressure drop required by Condition 30 of the PSD ACDP. LRAPA issued a letter of approval of the modified pressure drop ranges on August 25, 2000.

10. No formal complaints have been received related to the operation of this facility since the PSD ACDP was issued in June of 1998.

EMISSION UNITS DESCRIPTION:

11. Existing emission points at the facility consist of the following:

12. **[P5]** Electric Arc Furnace No. 3 (EAF 3): 18 MW submerged arc furnace within a semi-enclosed building, with two baghouses as control for particulate emissions (BH-3 and BH-6), constructed in 1975. The top of the furnace is open with a hood drawing fumes from above the furnace to a dedicated baghouse (BH-3). Tap fume is also captured by a hood just above the tap hole and is returned to the furnace. The second baghouse ('scavenger') (BH-6) collects a portion of the fume when it escapes capture at the main hood by collecting air and fume at the roofline of the building.

13. **[P1]** Main fume silo controlled by a baghouse (BH-11), installed prior to 1975. Fume removed by baghouse #3 from the airstream drawn through the main furnace hood is pneumatically conveyed to the main fume silo. Particulate matter emitted from the main fume silo is controlled by baghouse #11.

14. **[P2]** Densifying, controlled by a baghouse (BH-12), installed in 1990. Fume from the main fume silo is pneumatically conveyed to the densifier, where using an air flotation and settling process, the fume is compacted. Particulate matter generated in this process is controlled by baghouse # 12.

15. **[P3]** Densified fume storage and loadout, controlled by a baghouse (BH-9), installed in 1991. Compacted fume is stored in this bin which is controlled by baghouse #9. From the bin fume is loaded to trucks or totes for shipment offsite.

16. **[P4]** Product crushing, controlled by a baghouse (BH-7), installed prior to 1978. Silicon metal chunks are transferred via front-end loader to storage areas (enclosed) or to the feed hopper for the crushing line. Material is conveyed from the hopper to the jaw crusher and then to a vibrating screen and may be routed back to the crusher if not properly sized. Sized material is moved to a storage area or to totes or trucks for shipment offsite.

17. **[P6]**Furnace building fugitive particulate matter is partially controlled by a baghouse (baghouse #6) that draws from the area at the underside of the peak of the building roof.

18. **[P7]**Fume stored in the main fume silo can either be routed to the densifier or directed to a storage silo that holds it for the pellet-making process ('pelletizing'). The pelletizer rolls fume in water to produce pellets. The silo and pelletizer are controlled by the #4 baghouse.

19. **[P8]** Raw materials (coal, woodchips, quartz gravel, coke, other additives) are loaded via front-end loader to a skip hopper or onto a conveyer belt from which the raw materials drop into a mix hopper. From the mix hopper the mix is conveyed up to the top of the furnace building above the furnace deck to hoppers for delivery as-needed into the furnace. The mix hopper and connected conveyor drops are controlled by baghouse #5.

20. **[P28]** P28 is the emission point for the two baghouses that control laboratory activities. Samples of raw materials and product are prepared for analytical work and any dust generated is captured by baghouse 13A/B. This is an insignificant emission source.

21. **[F1]** Raw material handling, without emission controls, installed prior to 1978. Raw materials (coal, woodchips, quartz gravel, coke, other additives) are loaded via front-end loader to a skip hopper or onto a conveyer belt from which the raw materials drop into a mix hopper.

22. **[F2]** Raw material storage piles, without emissions controls, installed prior to 1978. Raw materials (coal, woodchips, quartz gravel, coke, other additives) are stored in outdoor storage piles and a portion of the woodchips is kept dry in indoor storage piles. Coal and gravel are unloaded from railcars via crane. Woodchips and coke are dumped from trucks to piles.

23. **[F3]** Roadways and parking lots, without emissions controls, installed prior to 1978. Paved roadways and parking lots.

24. **[F4]** F4 is the designation for fugitive emissions from the EAF-3 furnace building. These fugitive emissions are a result of furnace instability and associated fuming that escapes capture by the primary furnace hood (delivered to Baghouse #3) and also bypasses the scavenger system (P6).

25. **[F7]** F7 is the designation for fugitive emissions from the product crushing and screening operation.

26. Globe has indicated the following arrangement of the above emitting activities into emission units:

- EU-1 includes P5 and P6 (the emission points for the number 3 and number 6 baghouses respectively).
- EU-2 includes fume handling and processing activities with P1, P2, P3,and P7 which are the main silo baghouse emission point, the 'densifying' silo baghouse emission point, the fume storage and loadout silo emission point, and the pelletizer silo baghouse emission point, respectively.
- EU-3 includes P4 which is the product crushing and screening baghouse emission point.
- EU-F1 includes raw material mixing and handling. P8 is the emission point for the raw material mixing baghouse, and F-1 is the designation for fugitive emissions generated when raw materials are moved from storage piles to the mixing conveyors.
- EU-F2 is the designation for the fugitive emissions from raw material storage piles including material load-in and load-out, wind erosion, and vehicle movement on the piles.
- EU-F3 is the designation for fugitive emissions from vehicle traffic on roadways and parking lots.
- EU-F4 is the designation for fugitive emissions from the electric arc furnace building.

- EU-F7 is the designation for fugitive emissions from the product crushing and screening operation.

27. Categorically insignificant activities include the following:
    - Evaporative and tail pipe emissions from on-site motor vehicle operation
    - Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
    - Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
    - Office activities
    - Janitorial activities
    - Personal care activities
    - Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
    - Instrument calibration
    - Maintenance and repair shop
    - Automotive repair shops or storage garages
    - Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
    - Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
    - Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
    - Temporary construction activities
    - Warehouse activities
    - Accidental fires
    - Air vents from air compressors
    - Electrical charging stations
    - Fire brigade training
    - Blueprint making
    - Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
    - Electric motors
    - Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
    - On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
    - Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
    - Pressurized tanks containing gaseous compounds
    - Fire suppression and training
    - Paved roads and paved parking lots within an urban growth boundary
    - Health, safety, and emergency response activities
    - Emergency generators and pumps used only during loss of primary equipment or utility service
    - Industrial cooling towers that do not use chromium-based water treatment chemicals
    - Oil/water separators in effluent treatment systems

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

28. This Title V operating permit includes 6 conditions that apply to the entire facility (Conditions 6 through 11).

Each applicable requirement and the monitoring and recordkeeping determined sufficient to determine the facility's compliance status is outlined below:

28.a. Condition 6 establishes the minimum 'reasonable precautions' a facility must take to avoid creating fugitive dust problems. Because dust generated by fugitive-type sources is difficult to measure using reference test methods, and because fugitive emissions can be a problem without exceeding 20 percent opacity, this condition acts as a 'gap-filling' requirement for those cases where a potential problem is identified but a reference method opacity determination may not be feasible.

28.b. Condition 7 requires that Globe institute a formal and Authority-approved inspection and maintenance program. The I&M plan required will help to ensure that the facility is doing what it can to maintain control devices in a condition that minimizes air emissions, and will allow the permittee to identify a hierarchy of steps to be taken should the EAF or other on-site activities get out of control.

28.c. Condition 8 establishes the sulfur limits for fuels and reactants at the facility and Condition 9, the monitoring required to determine compliance with fuel/reactant sulfur limits.

28.d. Condition 10 outlines the Authority's nuisance-prevention requirements for the facility. A complaint log is required to be maintained to document that the permittee has responded responsibly to any complaint received.

28.e. Condition 11 requires that the permittee address and comply with the provisions of 40 CFR 68 (Accidental Release Prevention-Emergency Response Planning) should these requirements become applicable to the facility.

29. Conditions 12 through 16 are applicable requirements specific to operation of the electric arc furnace and its control equipment and are described further below. The arc furnace was first fired in 1976 and, relying on statements made by the applicant, has not been reconstructed so as to trigger applicability of the NSPS (40CFR60.260-266) since the first firing.

29.a. Condition 12 establishes emission action levels and required monitoring and recordkeeping to ensure that the electric arc furnace emission control equipment is maintained in a condition that represents 'highest and best' practical control of furnace emissions. The emission action level for baghouses is the pressure drop range and alarm requirements from the facility PSD ACDP Condition 30 as modified with Authority approval. In addition, the flow rates into the main hood and the scavenger baghouse intake duct are required to monitored. The main hood furnace gas flow is reduced by any dilution air entering at any point between the hood and the blower so the presence of dilution leakage can be discovered if the flow is known in conditions of minimal leakage. The scavenger system flow will determine the degree to which furnace reaction control excursions are captured (a portion of the fume escaping the main hood during control excursions is captured by this system) and the Title V application indicates uncertainty in the flow rate entering this system.

29.b. Condition 13 establishes the opacity limit and monitoring and recordkeeping requirements for this emission unit. Baghouses maintained in good condition are not expected to exceed the opacity limit so the frequency of required visible emission monitoring has been adjusted, relying instead on the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 12.

29.c. Condition 14 establishes the particulate matter concentration limit for this emission unit. Baghouses maintained in good condition and that are well within the opacity limits should not exceed this limit, so the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 12 as well as periodic visible emission surveys will be used to determine the compliance status of this emission unit with this standard.

29.d. Condition 15 is the 'process weight-particulate matter emissions' limit for this emission unit. The limit applies as well to fugitive emissions from the furnace, so EU-F4 emissions (furnace building fugitives) have to be added to EU-1 to compare to the limit in the standard. The condition specifies the emission estimating procedure to use in determining compliance with this limit.

29.e. Condition 16 outlines the required emission factor verification testing for this emission unit. Operating parameter ranges (emission action levels) contained in condition 12 will be confirmed during tests that show compliance with opacity, process weight, and grain loading limits. In order to determine or confirm PSEL emission factors, this condition also includes monitoring of furnace activities, production and material input, and includes limits to ensure the PSELs are not exceeded.

30. Conditions 17 through 21 are applicable requirements specific to operation of the Main Fume Silo, all other fume handling processes, and associated emission control equipment and are described further below.

30.a. Condition 17 establishes emission action levels and required monitoring and recordkeeping to ensure that the fume handling processes' emission control equipment is maintained in a condition that represents 'highest and best' practical control emissions. The emission action level for baghouses is the pressure drop range and alarm requirements from the facility PSD ACDP Condition 30 as modified with Authority approval.

30.b. Condition 18 establishes the opacity limit and monitoring and recordkeeping requirements for this emission unit. Baghouses maintained in good condition are not expected to exceed the opacity limit so the frequency of required visible emission monitoring has been adjusted, relying instead on the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 17.

30.c. Condition 19 establishes the particulate matter concentration limit for this emission unit. Baghouses maintained in good condition and that are well within the opacity limits should not exceed this limit, so the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 17 as well as periodic visible emission surveys will be used to determine the compliance status of this emission unit with this standard.

30.d. Condition 20 is the 'process weight-particulate matter emissions' limit for this emission unit. The condition specifies the emission estimating procedure to use in determining compliance with this limit.

30.e. Condition 21includes the PSEL requirements for this emission unit.

31. Conditions 22 through 26 are applicable requirements specific to operation of the product-metal handling activities including crushing, screening, storage, and loadout and associated emission control equipment. The requirements are described further below.

31.a. Condition 22 establishes emission action levels and required monitoring and recordkeeping to ensure that the product-metal handling processes' emission control equipment is maintained in a condition that represents 'highest and best' practical control emissions. The emission action level for baghouses is the pressure drop range and alarm requirements from the facility PSD ACDP Condition 30 as modified with Authority approval.

31.b. Condition 23 establishes the opacity limit and monitoring and recordkeeping requirements for this emission unit. Baghouses maintained in good condition are not expected to exceed the opacity limit so the frequency of required visible emission monitoring has been adjusted, relying instead on the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 22.

31.c. Condition 24 establishes the particulate matter concentration limit for this emission unit. Baghouses maintained in good condition and that are well within the opacity limits should not exceed this limit, so the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 22 as well as periodic visible emission surveys will be used to determine the compliance status of this emission unit with this standard.

31.d. Condition 25 is the 'process weight-particulate matter emissions' limit for this emission unit. The condition specifies the emission estimating procedure to use in determining compliance with this limit.

31.e. Condition 26 includes the PSEL requirements for this emission unit.

32. Conditions 27 through 31 are applicable requirements specific to raw material handling and mixing and associated emission control equipment. The requirements are described further below.

32.a. Condition 27 establishes emission action levels and required monitoring and recordkeeping to ensure that the raw material mixing and handling processes' emission control equipment is maintained in a condition that represents 'highest and best' practical control emissions. The emission action level for the baghouse is the pressure drop range and alarm requirements from the facility PSD ACDP Condition 30 as modified with Authority approval.

32.b. Condition 28 establishes the opacity limit and monitoring and recordkeeping requirements for this emission unit. Baghouses maintained in good condition are not expected to exceed the opacity limit so the frequency of required visible emission monitoring for the baghouse in this emission unit has been adjusted, relying instead on the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 27. Raw material handling activities without control (fugitive emission sources) are monitored according to the fugitive survey and corrective action requirements of condition 41.

32.c. Condition 29 establishes the particulate matter concentration limit for this emission unit. Baghouses maintained in good condition and that are well within the opacity limits should not exceed this limit, so the facility I&M program required in Condition 7 and the parameter monitoring and emission action levels specified in Condition 27 will be used for the baghouse in this emission unit. The raw material handling activities without control (fugitive emission sources) are monitored according to the fugitive survey and corrective action requirements of condition 41.

32.d. Condition 30 is the 'process weight-particulate matter emissions' limit for this emission unit. The condition specifies the emission estimating procedure to use in determining compliance with this limit.

32.e. Condition 31 includes the PSEL requirements for this emission unit.

33. Condition 33 is the applicable requirement specific to EU-F2 raw material storage piles which have no associated emission control equipment. The requirement is that fugitive emissions from the piles do not equal or exceed 20 percent opacity. Monitoring for this condition is periodic visible emission surveys and the condition requires corrective action if visible emissions are detected.

34. Condition 34 is the applicable requirement specific to EU-F3 roadways and parking lot which have no associated emission control equipment. The requirement is that fugitive emissions from these sources do not equal or exceed 20 percent opacity. Monitoring for this condition is periodic visible emission surveys and the condition requires corrective action if visible emissions are detected.

35. Conditions 35 is the applicable requirement specific to EU-F4 furnace building fugitive emissions. The requirement is that fugitive emissions from this source do not equal or exceed 20 percent opacity. Monitoring for this condition includes operator logs of duration and extent of any visible emissions escaping the hood, and EPA Method 9 certified readers observing any of these emissions that escape the furnace building. This emission unit frequently emits visible particulate matter and the complicated monitoring requirement is necessary in lieu of a continuous opacity monitor which the permittee has indicated is not economical.

36. Condition 36 is the applicable requirement specific to EU-F7 product crushing and screening fugitive emissions. The requirement is that fugitive emissions from this source do not equal or exceed 20 percent opacity. Monitoring for this condition is periodic visible emission surveys and the condition requires corrective action if visible emissions are detected.

37. Condition 37 outlines the requirements that can apply to insignificant emission units (both categorically and aggregate insignificant). These units are subject to the universal opacity, grain loading, and process weight limits. No routine monitoring or testing is required for these although, should it become necessary, the testing methods are defined.

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION:

BASELINE EMISSION RATE

38. The operating schedule for the facility in the 1978 baseline year was 24 hours/day x 7 days/week x 50 weeks/year = 8400 hours/year.

39. Silicon metal 10,238 tons/1978

40. Raw material input 90,536 tons/1978

1978 BASELINE EMISSIONS TABLE

Source	PM	PM_{10}	SO_2	NO_X	VOC	CO	Pb
Main Fume Silo, P1	2.9	2.9	--	--	--	--	--
EAF 3, P5	11.0	11.0	480.0	308.0	16.0	216.0	0.0003
Crushing & Screening, F7	30.0	20.0	--	--	--	--	--
Storage & Mixing, F1/F2	13.0	5.0	--	--	--	--	--
Road & Parking Lots, F3	3.0	1.2	--	--	--	--	--
EAF 3 Fugitives, F4	263.0 323.0	226.0 266.0	118.0 598.0	78.0 386.0	4.1 20.0	54.0 270.0	0.02 0.0203

HISTORY OF CHANGES TO THE PLANT SITE EMISSION LIMIT (PSEL)

41. The following changes have been made to the baseline and the Plant Site Emission Limit (PSEL):

42. emission calculations were updated using the best data available, source test data and engineering judgment,

43. fugitive emissions which have always been present at the facility have been added to both the baseline

emissions and the proposed PSEL.

PLANT SITE EMISSION LIMIT (PSEL)

44. The proposed operating schedule for this operating permit is different from baseline year: 24 hours/day x 365 days/year = 8760 hours/year.

45. The proposed plant production for the facility is different than baseline as listed below.

46. Silicon production.....15,500 tons/year

46.a.i. b. Raw material input.....107,830 tons/year

47. The proposed plant site emission limit (PSEL) (tons per year) is as follows:

Source	PM	PM_{10}	SO_2	NO_X	VOC	CO	Pb
Main Fume Silo, P1	3.0	3.0	--	--	--	--	--
Densifier, P2	0.8	0.8	--	--	--	--	--
Fume Storage & Loading, P3	0.4	0.4	--	--	--	--	--
EAF 3, P5/P6	25.3	25.3	18.7	393	21.0	276.4	0.0004
Crushing & Screening fugitives, F7	10.9	7.8	--	--	--	--	--
Crushing & Screening P4	0.8	0.8	--	--	--	--	--
Pelletizer, P7	0.2	0.2	--	--	--	--	--
Raw Material Mixing, P8	0.35	0.35	--	--	--	--	--
Raw Material Handling , Mixing Fugitives, F1	6.8	2.8	--	--	--	--	--
Raw Material Storage Pile Fugitives, F2	5.2	2.4	--	--	--	--	--
Road & Parking Lots, F3	2.9	1.2	--	--	--	--	--
EAF 3 Fugitives, F4	89.3	89.3	0.003	4.4	0.4	1.7	0.00002
TOTALS	**146**	**134**	**19**	**397**	**21**	**278**	**0.0004**

47.a.i. The PSEL is based on the production and emission factors listed in the detail sheets attached to this permit review report (Attachment 1). The detail sheets provided by the applicant included data that were revised to better represent emissions (most significant changes were necessary in furnace building fugitive emission calculations: EU-F4). The calculations of revisions are included in Attachment 2.

PSD REQUIREMENTS [LRAPA Title 38 (OAR 340-028-1900 through 2000)]

48. The proposed PSELs for PM, PM10, SO_2, and lead for the facility are less than adjusted baseline emissions. CO, NO_X, , and VOC have increased slightly above the calculated baseline emissions. No pollutant is estimated to have increased above the SER (triggered a need for NSR/PSD review). Proposed emissions compared to baseline emissions and the Significant Emission Rate (SER), LRAPA 38-005(12), are detailed below:

Pollutant	1978 Baseline (tons/year)	Proposed (tons/year	Increase (tons/year)	SER (tons/year)
PM	323	146	-177	25
PM_{10}	266	133	-133	15
NO_X	386	398	12	40
CO	270	278	8	100
SO_2	598	18.7	-579.3	40
VOC	20	21.3	1.3	40
Pb	0.02	0.0004	-0.0196	0.6

HAZARDOUS AIR POLLUTANTS

49. A breakdown of the individual HAPs for the facility is detailed in the permit application. Based on the information submitted, this source is not major for HAPs. Refer to the application for specific HAPs emissions information.

PUBLIC PARTICIPATION

50. The draft permit was placed on public notice from October 20, 2000, to November 21, 2000. There was no request for a public hearing, so none was held.

Though no comments were received from the public, the applicant (Globe Metallurgical) submitted a letter (Attachment 3) dated November 10, 2000, with several comments. The itemized comments were addressed in this proposed permit as follows:

50.a. The referenced condition 25.a.ii included a typographical error that was corrected.

50.b. The referenced condition 31.a included a typographical error that was corrected.
50.c. The referenced condition 35 Table 8 included a typographical error that was corrected.
50.d. The referenced condition 39, SO_2 included a typographical error that was corrected.
50.e. The referenced condition 40.d included a typographical error that was corrected.
50.f. The referenced condition 40.e included a typographical error that was corrected.
50.g. The referenced condition 40.f includes a requirement that emission calculations be performed within 7 days of the end of each calendar month. LRAPA disagrees with this comment and has not relaxed or removed the requirement as requested. This requirement is based on OAR-340-218-0050(3)(c)(B).
50.h. The referenced condition 43 included unnecessary verbiage that was removed in agreement with the comment.
50.i. The referenced condition 48 includes standard reporting requirements for all Title V permits. The applicant was advised to review Title V regulations, and no change was made to the condition.

The proposed permit was sent to EPA on December 6, 2000, for a 45-day review period. LRAPA requested and EPA agreed to an expedited review because there were no substantive or adverse comments during the comment period. The public will have 105 days (45-day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.

RK
1/8/01