John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

2/3/2014

Certified Mail

Matthew Yoak
Kaiser Aluminum
600 Kaiser Drive
Heath, OH 43056

Facility ID: 0145010093
Permit Number: P0083707
County: Licking

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 4/12/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Central District Office

Response to Comments

Facility ID:	0145010093
Facility Name:	Kaiser Aluminum
Facility Description:	Aluminum extruded products
Facility Address:	600 Kaiser Drive Heath, OH 43056 Licking County
Permit:	P0083707, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Newark Advocate on 04/15/2012. The comment period ended on 05/15/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Emission Testing - (Comment Received from U.S. EPA)

a. Comment: Condition B.2.(b)(2) limits the facility-wide potential to emit for hazardous air pollutants (HAP) to avoid major source requirements specified in Subpart RRR. The limited potential for the facility has been set at 9.9 tons per year (TPY) of a single HAP. The calculations used to verify that the facility is in compliance with this facility-wide limitation are based on a stack test conducted in 1999. The primary source of HAP emission is solid flux used in the remelt furnaces (P005, P006, P007, and P020). Considering that this facility is a synthetic minor source for HAP emissions with a limitation just beneath the threshold for major source status, Ohio should consider requiring stack testing to verify that the emission factors from the 1999 stack test are still reflective of the facility's operations.

b. Response: Ohio EPA removed Section B.2.(f)(1) which read:

"*(1) Compliance with the emission limitations in Section 2.a) of these terms and conditions shall be determined in accordance with the following methods:*

(a) Emission Limitation:

The total HCl emissions from emissions units P005, P006, P007, and P0202 combined shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based on the record keeping in Section d)(1)."

and replaced it with the following:

"*(1) Compliance with the emission limitations in Section 2.a) of these terms and conditions shall be determined in accordance with the following methods:*

(a) Emission Limitation:

The total HCl emissions from emissions units P005, P006, P007, and P020 combined shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based on the testing requirements specified in Section f)(1)(b) and the record keeping in Section d)(1).

(b) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(i) The emission testing shall be conducted within 6 months of permit issuance and within 30 days of the utilization of a salt flux containing aHCl producing chloride other than $MgCl_2$.

(ii) The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl by verifying the HCl emission factors utilized in Section d)(1).

(iii) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and 26A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(iv) The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

(v) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The

"Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

(vi) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(vii) A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency."

2. Topic: Operational Restrictions - (Comment Received from U.S. EPA)

a. Comment: Section B.2.(c)(1) provides operational restrictions for chlorine usage, as reactive flux, for emission units P005, P006, P007, and P020. It is not clear from the requirement what type of flux or chlorine content is being utilized at the facility. Chlorine and hydrochloric acid, a HAP, emissions can vary due to the chlorine content in the flux. Ohio should consider adding more specific language limiting the chlorine content in the fluxing agent to ensure that the facility can maintain compliance with its synthetic minor HAP limitation.

b. Response: Kaiser Aluminum currently and historically uses three types of solid flux in its process; A130, SF224, and ProMag. The chlorine containing salts present in the three fluxes consist of $MgCl_2$ and KCl. Thermodynamic analysis and lab testing provided to OEPA by Kaiser Aluminum show that of the two chlorides only $MgCl_2$ contributes to the formation of HCl during the fluxing process. Therefore, Ohio EPA removed Sections B.2.c) and B.2.d) which read:

"*c) Operational Restrictions*

(1) The maximum annual chlorine usage (as reactive flux) for emissions units P005, P006, P007 and P020 combined shall not exceed 12.86 tons, based upon a rolling, 12-month summation of the monthly chlorine usage rates. The emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the chlorine usage rates, upon issuance of this permit.*

** The annual chlorine usage limitation of 12.86 tons for emissions units P005, P006, P007 and P020 combined was established as follows:*

[9.9 tons HCl/yr]/[0.77] = 12.86 tons chlorine usage/yr;

where:

0.77 is the emission factor established based on the results of the July 27 and 28, 1999 emission tests in units of lbHCl/lb chlorine used.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P005, P006, P007, and P020 combined:

(a) the chlorine usage for each month, in tons; and

(b) the rolling 12-month summation of the chlorine usage rates.

[Authority for term: OAC rule 3745-77-07(C)]"

and replaced it with the following:

"*c) Operational Restrictions*

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P005, P006, P007, and P020 combined:

(c) the company identification for each type of flux employed;

(d) the number of pounds of chlorine gas flux and salt flux (for salt fluxes containing HCl producing chlorides) employed;

(e) the HCL producing chloride content of each salt flux employed in pounds chloride per pound of salt flux;

(f) the HCl emissions for each month, in tons, determined using the following calculation:

$$E_{HCl} = \frac{(G)(EF_G) + \sum_{i=1}^{n} (S_i)(F_i)(EF_{Si})}{2000 \text{ lb/ton}}$$

Where:

E_{MO} = Monthly HCl Emissions (tons).

G = Gaseous Chlorine (Cl_2) utilized (lbs.).

EF_G = Gaseous Chlorine emission factor (lbs. HCl/lb. CL_2). Use 0.39 lbs. HCl/lb. Cl2 (based on average of 3 test runs at Kaiser (1999)) or the value determined from the most recent stack test performed.

S_i = The amount of each salt flux, which contains HCl producing chlorides utilized during the month (lbs.).

F_i = For each salt flux, which contains HCl producing chlorides, the fraction, by weight of the HCl producing chloride in the salt flux.

EF_M = HCl producing chloride emission factor (lbs. HCl/lb chloride). Use 0.15 lbs. of HCl/lb chloride ($MgCl_2$) (based on average 6 test runs at Kaiser Trentwood (2002 and 2003)) or the value determined from the most recent test performed.

; and

(g) the rolling 12-month summation of the HCl emission rates. The emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the HCl emission rates, upon issuance of this permit.

[Authority for term: OAC rule 3745-77-07(C)]"

3. Topic: Compliance with Annual Emission Limitations - (Comment Received from U.S. EPA)

a. Comment: The permit must include a method to demonstrate compliance with the annual emission limits listed in Applicable Emission Limitations and/or Control Requirements for emission units P028, B019, and B020 in addition to compliance with the hourly emission rate.

b. Response: Ohio EPA removed Section C.1.f)(1)f. and C.2.f)(1)f. which utilized the format:

"*I. Emission Limitations*

*Particulate emissions shall not exceed tons per year, sulfur dioxide emissions shall not exceed **###** ton per year, volatile organic compound emissions shall not exceed ton per year, nitrogen oxides emissions shall not exceed **###** tons per year and carbon monoxide emissions shall not exceed **###** tons per year.*

Applicable Compliance Method

These allowable emission limitations were established to reflect the potential to emit for particulate, sulfur dioxide, volatile organic compounds, nitrogen oxides and carbon monoxide emissions for this emissions unit. Compliance with the short-term emission limitations for particulates, sulfur dioxide, volatile organic compounds, nitrogen oxides and carbon monoxide will ensure compliance with these emission limitations."

and replaced it with Sections C.1.f)(1)f. – k. and C.2.f)(1)f. – k.which utilize the following format:

"*Emission Limitation*

*[**Pollutant**] emissions shall not exceed [**Annual Emission Limit**] tons per year.*

Applicable Compliance Method

*Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022 mmcf/hr) by the AP-42 [**pollutant**] emission factor for natural gas (**X**lbs of [**pollutant**]/mmcf) from Section 1.4, Table 1.4-1, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton."*

4. Topic: Frequency of Visible Emission Checks - (Comment Received from Kaiser Aluminum)

a. Comment: In general we found the terms and conditions of the renewed draft permit to be very similar to the existing permit, however, additional monitoring requirements were included for the melting furnaces for daily visible emissions checks (page 32 of 35 under Emissions Unit Group 3 Section 3(d)(3)). To better understand the new requirements we performed a review of the cited regulatory authority as well as a review of previously issued Title V permits for several other manufacturer's with aluminum melting furnaces. Based on the review of the permits for several of the other manufacturer's we noted that terms and conditions did not require daily visible emissions checks but weekly (see attached pages of the Title V permits for other manufacturing facilities).

To our knowledge there have not been any incidents associated with visible emissions from the melting furnaces, so to establish consistency with permit terms and conditions for similar emission units at other manufacturing facilities and to not potentially place our facility at a competitive disadvantage we request the draft permit be amended and the requirement for a daily visible emission check from the melting furnaces be changed to a weekly requirement.

b. Response: Due to the historical lack of visible emissions noted in Kaiser Aluminum's record keeping and during Ohio EPA inspections Ohio EPA changed Section C.3(d)(3) to require weekly emissions checks.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Kaiser Aluminum

Facility ID:	0145010093
Permit Number:	P0083707
Permit Type:	Renewal
Issued:	2/3/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Kaiser Aluminum

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Authorization

Facility ID:	0145010093
Facility Description:	Aluminum extruded products
Application Number(s):	A0014098, A0043923
Permit Number:	P0083707
Permit Description:	Renewal Title V permit for a secondary aluminum production facility including four remelt furnaces and three homogenization furnaces
Permit Type:	Renewal
Issue Date:	2/3/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0083706

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Kaiser Aluminum
600 Kaiser Drive
Heath, OH 43056

Ohio Environmental Protection Agency (EPA)District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Central District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Applicable Emissions Limitations and/or Control Requirements

   a) Emissions from this facility shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart RRR [In accordance with 40 CFR 63.1500 this facility is an existing secondary aluminum production facility subject to the emission limitations/control measures specified in this section.]	See b)(1)
b.	40 CFR 63.1-16	Appendix A to 40 CFR Part 63, Subpart RRR – General Provisions Applicability to Subpart RRR shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid major source terms of 40 CFR Part 63, Subpart RRR)	The total HCl emissions from emissions units P005, P006, P007, and P020 combined shall not exceed 9.9 tons per rolling, 12-month period. See b)(2) and d)(1)

   b) Additional Terms and Conditions

      (1) The following emissions units contained in the permit are subject to 40 CFR Part 63, Subpart RRR: P005, P006, P007,and P020. The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Central District Office.

      (2) The permittee has requested to limit the facility-wide potential to emit (PTE) for Hazardous Air Pollutants(HAPs) to avoid the major source requirements specified in Subpart RRR. The facility-wide PTE for HAPs,with the restrictions in this permit*, is less than the major source threshold of 10 tons/year for a single HAP and25 tons/year for the combination of all HAPs, as rolling, 12-month summations.

*As described in Section 2.a)c. and 2.d)(1), HAP emissions of hydrogen chloride, hydrogen fluoride, and chlorine arelimited by restricting annual emissions (based on an emission factor for hydrogen chloride establishedthrough emission testing under worst-case conditions**). 40CFR63.1503 defines hydrogen chloride tomean emissions of hydrogen chloride that serve as a surrogate measure of the total emissions of the HAPshydrogen chloride, hydrogen fluoride, and chlorine. The hydrogen chloride and hydrogen fluoride emissionrates from emissions unit P020, based on the results of the July 27 and 28, 1999 emission tests, were 0.26lb/hr and 0.10 lb/hr (1.14 tons HCl and 0.44 ton HF at 8760 hrs/yr of operation), respectively. Particulatematter (PM) testing was also conducted under worst-case conditions**. 40CFR63.1503 defines PM asemissions of particulate matter that serve as a measure of total particulate emissions and as a surrogate formetal HAPs contained in the particulates, including but not limited to: antimony, arsenic, beryllium, cadmium,chromium, cobalt, lead, manganese, mercury, nickel, and selenium. Based on Table 1 of 65 FR15704, HAPmetals represent 0.68% of the total PM emissions.

The PM emission rate from emissions unit P020, based on the results of the July 27 and 28, 1999 emissiontests, was 2.44 lbs/hr (10.69 tons PM at 8760 hrs/yr of operation).

**Emissions unit P020 was operating at or near its maximum capacity during the emission tests witnessed bythe Ohio EPA, Central District Office on July 27 and 28, 1999. This was necessary to establish the emissionfactors for hydrogen chloride and hydrogen fluoride under worst-case conditions. Emissions units P005, P006,P007 and P020 use identical feed/charge and flux materials in the same proportions, are subject to the samework practices, and are of the same design. Therefore, the emission factor for hydrogen chloride andhydrogen fluoride applies to emissions units P005, P006 and P007. The worst-case PM emission rate fromemissions unit P020 (2.44 lbs/hr) also represent the worst-case PM emission rate from emissions units P005,P006 and P007.

Potential HAP metals emissions are:
(0.0068) X (10.69 tons/yr) X 4 = 0.28 ton HAP metals/yr.

Therefore, facility-wide*** HAP emissions (hydrogen chloride, hydrogen fluoride, chlorine, and HAP metals) arelimited to less than the major source threshold of 10 tons/year for each HAP and 25 tons/year for thecombination of all HAPs.

***The HAP emissions from emissions units B019 and B020 (natural gas-fired boilers) and the insignificantemissions units located at this facility are expected to be minimal.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P005, P006, P007, and P020 combined:

(2) the company identification for each type of flux employed;

(3) the number of pounds of chlorine gas flux and salt flux (for salt fluxes containing HCl producing chlorides) employed;

(4) the HCL producing chloride content of each salt flux employed in pounds chloride per pound of salt flux;

(5) the HCl emissions for each month, in tons, determined using the following calculation:

$$E_{MO} = \frac{(G)(EF_G) + \sum_{i=1}^{n} (S_i)(F_i)(EF_M)}{2000 \text{ lb/ton}}$$

Where:

E_{MO} = Monthly HCl Emissions (tons).

G = Gaseous Chlorine (Cl_2) utilized (lbs.).

EF_G = Gaseous Chlorine emission factor (lbs. HCl/lb. CL_2). Use 0.39 lbs. HCl/lb. Cl2 (based on average of 3 test runs at Kaiser (1999)) or the value determined from the most recent stack test performed.

S_i = The amount of each salt flux, which contains HCl producing chlorides utilized during the month (lbs.).

F_i = For each salt flux, which contains HCl producing chlorides, the fraction, by weight of the HCl producing chloride in the salt flux.

EF_M = HCl producing chloride emission factor (lbs. HCl/lb chloride). Use 0.15 lbs. of HCl/lb chloride ($MgCl_2$) (based on average 6 test runs at Kaiser Trentwood (2002 and 2003)) or the value determined from the most recent test performed.

; and

(6) the rolling 12-month summation of the HCl emission rates. The emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the HCl emission rates, upon issuance of this permit.

[Authority for term: OAC rule 3745-77-07(C)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling 12-month chlorine usage limitation. These reports shall be submitted in accordance with A. Standard Terms and Conditions – Section 2. of this permit.

[Authority for term: OAC rule 3745 77 07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section 2.a) of these terms and conditions shall be determined in accordance with the following methods:

(a) Emission Limitation:

The total HCl emissions from emissions units P005, P006, P007, and P020 combined shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based on the testing requirements specified in Section f)(1)(b) and the record keeping in Section d)(1).

(b) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(i) The emission testing shall be conducted within 6 months of permit issuance and within 30 days of the utilization of a salt flux containing aHCl producing chloride other than $MgCl_2$.

(ii) The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl by verifying the HCl emission factors utilized in Section d)(1).

(iii) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4 and 26A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(iv) The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control

scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

(v) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

(vi) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(vii) A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31:

B003 – (15) Natural Gas-Fired – Alcoa Soaking Furnaces;
B004 – 1.8 MMBtu/hr Natural Gas-Fired Sunbeam Inert Furnace;
B007 - (2) 4.3 MMBtu/hr Natural Gas-Fired, Swindell Furnaces for 10” Mill;
B008 – 2.4 MMBtu/hr Natural Gas-Fired, Loftus Furnace; and
B014 – 1.4 MMBtu natural Gas-Fired Dravd Lab Air Heater.

[Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. P028, Seco/Warwick Traveling Homogenization Furnace

Operations, Property and/or Equipment Description:

SECO/WARWICK Traveling Log Aluminum Homogenization Furnace. The unit contains six natural gas burner units with a maximum heat input rating of 23 MMBtu/hr

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0109591)	Particulate matter (PM) emissions shall not exceed 0.17 pounds per hour and 0.73 tons per year. Sulfur dioxide (SO_2) emissions shall not exceed 0.013 pounds per hour and 0.06 tons per year. Carbon monoxide (CO) emissions shall not exceed 1.8 pounds per hour and 8.1 tons per year. Volatile organic compound (VOC) emissions shall not exceed 0.12 pounds per hour and 0.53 tons per year. Nitrogen oxide (NO_x) emissions shall not exceed 1.1 pounds per hour and 4.8 tons per year. See b)(2)a. below
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)b. below
c.	OAC rules 3745-17-07(B) and 3745-17-08(B)	This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply to this fugitive emissions unit.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, SO_2, CO, VOC, and NO_x emissions from this air contaminant source since the uncontrolled potential to emit for PM, SO_2, CO, VOC, and $NO_x$is each less than 10 tons/year.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

Each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

Particulate emissions shall not exceed 0.17 pound per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 particulate emission factor for natural gas (7.6lbstotal particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98.

b. Emission Limitation

Sulfur dioxide emissions shall not exceed 0.013 pound per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4,Table 1.4-2, 7/98.

c. Emission Limitation

Volatile organic compound emissions shall not exceed 0.12 pound per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 volatile organic compound emission factor for natural gas (5.5 lbs of volatile organic compounds/mmcf) from Section 1.4, Table 1.4-2, 7/98.

d. Emission Limitation

Carbon monoxide emissions shall not exceed 1.8 pounds per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98.

e. Emission Limitation

Nitrogen oxides emissions shall not exceed 1.1 pounds per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 nitrogen oxides emission factor for natural gas (50lbs of nitrogen oxides/mmcf) from Section 1.4, Table 1.4-1, 7/98.

f. Emission Limitation

Particulate emissions shall not exceed 0.73tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 particulate emission factor for natural gas (7.6lbstotal particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

g. Emission Limitation

Sulfur dioxide emissions shall not exceed 0.06tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4,Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

h. Emission Limitation

Volatile organic compound emissions shall not exceed 0.53tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 volatile organic compound emission factor for natural gas (5.5 lbs of volatile organic compounds/mmcf) from Section 1.4, Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

i. Emission Limitation

Carbon monoxide emissions shall not exceed 8.1tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

j. Emission Limitation

Nitrogen oxides emissions shall not exceed 4.8 tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.022mmcf/hr) by the AP-42 nitrogen oxides emission factor for natural gas (50lbs of nitrogen oxides/mmcf) from Section 1.4, Table 1.4-1, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Homogenization Furnaces: B019,B020,

EU ID	Operations, Property and/or Equipment Description
B019	Thorpe #16 24 MMBtu/hrhomogenization furnace
B020	Thorpe #17 24 MMBtu/hrhomogenization furnace

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-05164)	Particulate emissions shall not exceed 0.18 pound per hour and .80 tons per year. Sulfur dioxide emissions shall not exceed 0.01 pound per hour and 0.06 ton per year. Nitrogen oxides emissions shall not exceed 2.4 pounds per hour and 10.5 tonsper year. Volatile organic compound emissions shall not exceed 0.13 pound per hour and 0.58 ton per year. Carbon monoxide emissions shall not exceed 2.0 pounds per hour and 8.8 tons per year.
b.	OAC rules 3745-17-07(B) and 3745-17-08(B)	This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply to this fugitive emissions unit.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>

Particulate emissions shall not exceed 0.18 pound per hour.

<u>Applicable Compliance Method</u>

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024 mmcf/hr) by the AP-42 particulate emission factor for natural gas (7.6lbstotal particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98.

b. <u>Emission Limitation</u>

Sulfur dioxide emissions shall not exceed 0.01 pound per hour.

<u>Applicable Compliance Method</u>

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024 mmcf/hr) by

the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4,Table 1.4-2, 7/98.

c. Emission Limitation

Volatile organic compound emissions shall not exceed 0.13 pound per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024 mmcf/hr) by the AP-42 volatile organic compound emission factor for natural gas (5.5 lbs of volatile organic compounds/mmcf) from Section 1.4, Table 1.4-2, 7/98.

d. Emission Limitation

Carbon monoxide emissions shall not exceed 2.0 pounds per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024 mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98.

e. Emission Limitation

Nitrogen oxides emissions shall not exceed 2.4 pounds per hour.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024 mmcf/hr) by the AP-42 nitrogen oxides emission factor for natural gas (100 lbs of nitrogen oxides/mmcf) from Section 1.4, Table 1.4-1, 7/98.

f. Emission Limitation

Particulate emissions shall not exceed 0.80tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024mmcf/hr) by the AP-42 particulate emission factor for natural gas (7.6lbstotal particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

g. Emission Limitation

Sulfur dioxide emissions shall not exceed 0.06tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4,Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

h. Emission Limitation

Volatile organic compound emissions shall not exceed 0.58tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024mmcf/hr) by the AP-42 volatile organic compound emission factor for natural gas (5.5 lbs of volatile organic compounds/mmcf) from Section 1.4, Table 1.4-2, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton

i. Emission Limitation

Carbon monoxide emissions shall not exceed 8.8tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

j. Emission Limitation

Nitrogen oxides emissions shall not exceed 10.5 tons per year.

Applicable Compliance Method

Compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (0.024mmcf/hr) by the AP-42 nitrogen oxides emission factor for natural gas (100lbs of nitrogen oxides/mmcf) from Section 1.4, Table 1.4-1, 7/98 and 8760 hours/year and dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Remelt Furnaces: P005,P006,P007,P020,

EU ID	Operations, Property and/or Equipment Description
P005	40MMBtu/hr No. 3 Remelt Furnace
P006	40MMBtu/hr No. 4 Remelt Furnace
P007	40MMBtu/hr No. 5 Remelt Furnace
P020	40MMBtu/hr No. 6 Remelt Furnace

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3) (For P005 and P007 established by PTI 01-038, for P006 established by PTI 01-190, and for P020 established by 01-205)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 18.31 pounds per hour.
d.	40 CFR Part 63, Subpart RRR [In accordance with 40 CFR 63.1500 this facility is an existing secondary aluminum production facility subject to the emission limitations/control measures specified in this section.]	See b)(2)a.
e.	40 CFR Part 63.1-15	Appendix A to 40 CFR Part 63, Subpart RRR – General Provisions Applicability to Subpart RRR shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee is subject to the following MACT rule: Secondary Aluminum Production, 40 CFR Part 63, Subpart RRR. The MACT Subpart RRR became effective on March 24, 2003. The requirements of this rule have been established in the Title V permit for this facility.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall not employ gaseous or liquid flux materials in the aluminum melting furnace.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) The permittee shall maintain the the weight of solid reactive flux materials added to each batch charge of aluminum melted in emission unit at or below the weight levels established during the most recent performance test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR Part 63, Subpart RRR, including the following sections:

63.1506	Operating requirements
63.1510	Monitoring requirements
63.1518	Applicability of general provisions

[Authority for term: 40 CFR Part 63, Subpart RRR and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)]

(2) For each day during which the permittee employs gaseous or liquid flux materials in the aluminum melting furnace, the permittee shall maintain a record of the type and quantity of gaseous or liquid flux materials employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)]

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)]

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart RRR, including the following sections:

63.1510	Monitoring requirements
63.1517	Records

[Authority for term 40 CFR Part 63, Subpart RRR and OAC rule 3745-77-07(C)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(2) An exceedance of the visible particulate emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the permittee complies with the requirements of OAC rule 3745-15-06 and none of the conditions listed in OAC rule 3745-15-06(C) are applicable to the source.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart RRR, including the following sections:

63.1515	Notifications
63.1516	Reports

[Authority for term: 40 CFR Part 63, Subpart RRR and OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

<u>Applicable Compliance Method</u>

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

Particulate emissions shall not exceed 18.31 pounds per hour.

Applicable Compliance Method

This emission limitation was established by converting the maximum process weight rate [18,667 pounds which is derived from dividing the maximum amount of aluminum that can be charged, 70,000 pounds, by the least amount of batch time*, 3.75 hours, to create a marketable product] to ton(s) per hour (P) and substituting this value for (P) into the appropriate equation given in OAC rule 3745-17-11, Table 1, to derive the particulate pounds per hour emission limitation (E). Based on emission tests conducted on July 27 and 28, 1999, and witnessed by the Ohio EPA, Central District Office, the tested particulate emission rate while emissions units P020 was operating at or near its maximum capacity was 2.44 pounds per hour.

*Batch time is calculated as the time that the aluminum is placed in the melter and heating begins until the molten aluminum is poured from the holder.

If required, compliance with the particulate emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable testing requirements under 40 CFR Part 63, Subpart RRR, including the following sections:

63.1511	Performance test/compliance demonstration general requirements
63.1512	Performance test/compliance demonstration requirements and procedures
63.1513	Equations for determining compliance

[Authority for term: 40 CFR Part 63, Subpart RRR and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.