



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01535**

CERTIFIED MAIL

DATE: 6/19/2003

GNW Aluminum, Inc.
Gary Hoopes
PO Box 2418 1356 Harrisburg Street
Alliance, OH 44601

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

Canton LAA

Stark County Area Transportation Study

WV

PA

STARK COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 15-01535 FOR AN AIR CONTAMINANT SOURCE FOR
GNW ALUMINUM, INC.**

On 6/19/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **GNW Aluminum, Inc.**, located at **1356 Harrisburg Street, Lexington Twp.**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 15-01535:

Reverberatory smelting aluminum furnace.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dan Aleman, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544 [(330)489-3385]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 15-01535

Application Number: 15-01535
APS Premise Number: 1576001922
Permit Fee: **To be entered upon final issuance**
Name of Facility: GNW Aluminum, Inc.
Person to Contact: Gary Hoopes
Address: PO Box 2418 1356 Harrisburg Street
Alliance, OH 44601

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1356 Harrisburg Street
Lexington Twp., Ohio**

Description of proposed emissions unit(s):
Reverberatory smelting aluminum furnace.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Records Retention Requirements

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.

4. 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

GNW Aluminum, Inc.

Facility ID: 1576001922

PTI Application: 15-01535

Issued: To be entered upon final issuance

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.

5. Scheduled Maintenance/Malfunction Reporting

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 appropriate Ohio EPA District Office or local air agency 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).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection

GNW Aluminum, Inc.

Facility ID: 1576001922

PTI Application: 15-01535

Issued: To be entered upon final issuance

Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

GNW Aluminum, Inc.

Facility ID: 1576001922

PTI Application: 15-01535

Issued: To be entered upon final issuance

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

GNW Aluminum, Inc.

Facility ID: 1576001922

PTI Application: 15-01535

Issued: To be entered upon final issuance

3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

Emissions Unit ID: **P001**

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	22.60
SO ₂	9.42
NO _x	9.02
CO	0.09
OC	0.35
D/F	0.0000017

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	40 CFR Part 63 Subpart RRR
P001 - Reverberatory smelting aluminum furnace	OAC rule 3745-31-05(A)(3)	

OAC rule 3745-17-07(A)

OAC rule 3745-17-11(B)(1)

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control Measures

The particulate emissions (PE) shall not exceed 5.16 lbs/hr and 22.6 tons/yr.

The sulfur dioxide (SO₂) shall not exceed 2.15 lbs/hr and 9.42 tons/yr.

The nitrogen oxide (NO_x) shall not exceed 2.06 lbs/hr and 9.02 tons/yr.

The carbon monoxide (CO) shall not exceed 0.02 lb/hr and 0.09 ton/yr.

The organic compound (OC) shall not exceed 0.08 lb/hr and 0.35 ton/yr.

Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

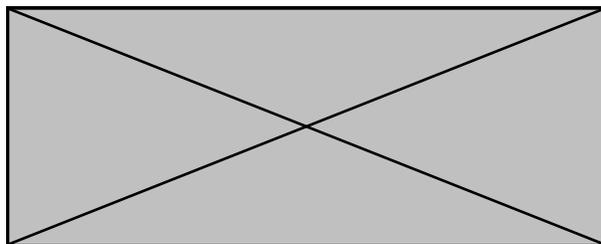
15 g of dioxin/furan TEQ per Mg (2.1 x 10⁻⁴ gr of dioxin/furan TEQ

per ton) of feed/charge from a furnace 1 at a secondary aluminum production facility that is an area source.

See section 2.a below.

2. Additional Terms and Conditions

- 2.a The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of:



Where,

L_i D/F = The D/F emission limit for individual emission unit I in paragraph (i)(3) of this section for a group 1 furnace; and

L_c D/F = The D/F emission limit for the secondary aluminum processing unit.

Note: Clean charge furnaces cannot be included in this calculation since they are not subject to the D/F limit.

B. Operational Restrictions

1. The permittee shall burn only No. 2 fuel oil in this emissions unit.
2. The sulfur content for the No. 2 fuel oil is not to be above 0.5 percent.
3. Dross are not permitted to be charged in the furnace.
4. Chlorine shall not be added for demagging the aluminum.
5. Pursuant to 40 CFR 63.1506(b), the permittee must provide and maintain easily visible labels, posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
 - a. The type of affected source or emission unit (*e.g.*, scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
 - b. The applicable operational standard(s) and control method(s) (work practice or control

Issued: To be entered upon final issuance

- device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.
- c. The afterburner operating temperature and design residence time for a scrap dryer/delacquering kiln/decoating kiln.
6. Pursuant to 40 CFR 63.1506(d), the permittee of each affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge must:
- a. Except as provided in paragraph (6)(c) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
- b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- c. The permittee may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
- i. The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and
- ii. All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
7. Pursuant to 40 CFR 63.1506(n)(2), operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burned a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned.
2. The permittee shall maintain daily records of the name and identification of each flux employed.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the

GNW**PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

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:

Issued: To be entered upon final issuance

- 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 emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. Pursuant to 40 CFR 63.1517, the permittee shall comply with the general record keeping requirements.
 5. Pursuant to 40 CFR 63.1510(b), the permittee must prepare and implement a written operation, maintenance, and monitoring (OM&M) plan. The permittee must submit the plan to the applicable permitting authority for review and approval as part of the application for a part 70 or part 71 permit. The plan must be accompanied by a written certification by the permittee that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The permittee must comply with all of the provisions of the OM&M plan as submitted to the permitting authority, unless and until the plan is revised in accordance with the following procedures. If the permitting authority determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the permittee must promptly make all necessary revisions and submit the revised plan. If the permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the permittee submits a description of the changes and a revised plan incorporating them to the permitting authority. Each plan must contain the following information:
 - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
 - b. A monitoring schedule for each affected source and emission unit.
 - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in §§ 63.1505.
 - d. Procedures for the proper operation and maintenance of monitoring devices or systems

used to determine compliance, including:

- i. Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
 - ii. Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in subpart A of this part.
 - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
 - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of this section, including:
 - i. Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
 - ii. Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
 - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
 - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in paragraph (o) of this section for each group 1 furnace not equipped with an add-on air pollution control device.
6. Pursuant to 40 CFR 63.1510(c), Labeling, the permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in §§ 63.1506(b) are intact and legible.
 7. Pursuant to 40 CFR 63.1510(e), Feed/charge weight, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, , or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

- a. The accuracy of the weight measurement device or procedure must be $\pm\pm 1$ percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
- b. The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

8. Pursuant to 40 CFR 63.1510(o), Group 1 furnace, without add-on air pollution control devices. These requirements apply to the permittee of a group 1 furnace that is not equipped with an add-on air pollution control device.
 - a. The permittee must develop, in consultation with the responsible permitting authority, a written site-specific monitoring plan. The site-specific monitoring plan must be submitted to the permitting authority as part of the OM&M plan. The site-specific monitoring plan must contain sufficient procedures to ensure continuing compliance with all applicable emission limits and must demonstrate, based on documented test results, the relationship between emissions of PM and D/F and the proposed monitoring parameters for each pollutant. Test data must establish the highest level of PM and D/F that will be emitted from the furnace. This may be determined by conducting performance tests monitoring operating parameters while charging the furnace with fee/charge materials containing the highest anticipated levels of oils and coatings and fluxing at the highest anticipated rate. If the permitting authority determines that any revisions of the site-specific monitoring plan are necessary to meet the requirements of this section or this subpart, the owner or operator must promptly make all necessary revisions and resubmit the revised plan to the permitting authority.
 - i. The owner or operator of an existing affected source must submit the site-specific monitoring plan to the applicable permitting authority for a review at least 6 months prior to the compliance date.
 - ii. The permitting authority will review and approve or disapprove a proposed plan, or request changes to a plan, based on whether the plan contains sufficient provisions to ensure continuing compliance with applicable emission limits and demonstrates, based on documented test results, the relationship between emissions of PM, HCl, and D/F and the proposed monitoring parameters for each pollutant. Test data must establish the highest level of PM, HCl, and D/F that will be emitted from the furnace. Subject to permitting agency approval of the OM&M plan, this may be determined by conducting performance tests and monitoring operating parameters while charging the furnace with feed/charge materials containing the highest anticipated levels of oils and coatings and fluxing at the highest anticipated rate.
 - b. Each site-specific monitoring plan must document each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards.
 - c. Each site-specific monitoring plan must include provisions for unit labeling as required in paragraph (c) of this section, feed/charge weight measurement (or production weight

Issued: To be entered upon final issuance

- measurement) as required in paragraph (e) of this section and flux weight measurement as required in paragraph (j) of this section.
- d. Each site-specific monitoring plan for a melting/holding furnace subject to the clean charge emission standard in §§ 63.1505(i)(3) must include these requirements:
- i. The owner or operator must record the type of feed/ charge (*e.g.*, ingot, thermally dried chips, dried scrap, etc.) for each operating cycle or time period used in the performance test; and
 - ii. The owner or operator must submit a certification of compliance with the applicable operational standard for clean charge materials in §§ 63.1506(n)(3) for each 6-month reporting period. Each certification must contain the information in §§ 63.1516(b)(2)(iv).
- e. If a continuous emission monitoring system is included in a site-specific monitoring plan, the plan must include provisions for the installation, operation, and maintenance of the system to provide quality-assured measurements in accordance with all applicable requirements of the general provisions in subpart A of this part.
- f. If a continuous opacity monitoring system is included in a site-specific monitoring plan, the plan must include provisions for the installation, operation, and maintenance of the system to provide quality-assured measurements in accordance with all applicable requirements of this subpart.
- g. If a site-specific monitoring plan includes a scrap inspection program for monitoring the scrap contaminant level of furnace feed/charge materials, the plan must include provisions for the demonstration and implementation of the program in accordance with all applicable requirements in paragraph (p) of this section.
- h. If a site-specific monitoring plan includes a calculation method for monitoring the scrap contaminant level of furnace feed/charge materials, the plan must include provisions for the demonstration and implementation of the program in accordance with all applicable requirements in paragraph (q) of this section.
9. Pursuant to 40 CFR 63.1510(p) Scrap inspection program for group 1 furnace without add-on air pollution control devices. A scrap inspection program must include:
- a. A proven method for collecting representative samples and measuring the oil and coatings content of scrap samples;

- b. A scrap inspector training program;
 - c. An established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
 - d. Periodic physical measurements of oil and coatings content of randomly-selected scrap samples and comparison with visual inspection results;
 - e. A system for assuring that only acceptable scrap is charged to an affected group 1 furnace; and
 - f. Recordkeeping requirements to document conformance with plan requirements.
10. Pursuant to 40 CFR 63.1510(q) Monitoring of scrap contamination level by calculation method for group 1 furnace without add-on air pollution control devices. the permittee of a group 1 furnace dedicated to processing a distinct type of furnace feed/charge composed of scrap with a uniform composition (such as rejected product from a manufacturing process for which the coating-to-scrap ratio can be documented) may include a program in the site-specific monitoring plan for determining, monitoring, and certifying the scrap contaminant level using a calculation method rather than a scrap inspection program. A scrap contaminant monitoring program using a calculation method must include:
- a. Procedures for the characterization and documentation of the contaminant level of the scrap prior to the performance test.
 - b. Limitations on the furnace feed/charge to scrap of the same composition as that used in the performance test. If the performance test was conducted with a mixture of scrap and clean charge, limitations on the proportion of scrap in the furnace feed/charge to no greater than the proportion used during the performance test.
 - c. Operating, monitoring, recordkeeping, and reporting requirements to ensure that no scrap with a contaminant level higher than that used in the performance test is charged to the furnace.
11. Pursuant to 40 CFR 63.1510(s), site-specific requirements for secondary aluminum processing units.
- a. The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with § 63.1510(b), the following information:
 - i. The identification of each emission unit in the secondary aluminum processing unit;
 - ii. The specific control technology or pollution prevention measure to be used for

Issued: To be entered upon final issuance

- each emission unit in the secondary aluminum processing unit and the date of its installation or application;
- iii. The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
 - iv. Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and
 - v. The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour, rolling average using the procedure in §§ 63.1510(t).
- b. Pursuant to 40 CFR 63.1510(o), the SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- i. Any averaging among emissions of differing pollutants;
 - ii. The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;
 - iii. The inclusion of any emission unit while it is shut down; or
 - iv. The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- c. To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the applicable permitting authority containing the information required by paragraph (s)(1) of this section and obtain approval of the applicable permitting authority prior to implementing any revisions.
12. Pursuant to 40 CFR 63.1510(t), Secondary aluminum processing unit. Except as provided in paragraph (u) of this section, the owner or operator must calculate and record the 3-day, 24-hour, rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour, rolling average, the owner or operator must:
- a. Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the

Emissions Unit ID: **P001**

feed/charge weight information required in paragraph (e) of this section. If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.

- b. Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds.
- c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- d. Compute the 24-hour daily emission rate using Equation 4:

Where,

E_{day} = The daily PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the 24-hour period;

T_i = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period (tons);

ER_i = The measured emission rate for emission unit i as determined in the performance test (lb/ton or $\mu\text{g}/\text{Mg}$ of feed/charge); and

n = The number of emission units in the secondary aluminum processing unit.

- e. Calculate and record the 3-day, 24-hour, rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
13. Pursuant to 40 CFR 63.1510(u), Secondary aluminum processing unit compliance by individual emission unit demonstration. As an alternative to the procedures of paragraph (t) of this section, an owner or operator may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

Issued: To be entered upon final issuance

14. Pursuant to 40 CFR 63.1510(w), Alternative monitoring methods. If an owner or operator wishes to use an alternative monitoring method to demonstrate compliance with any emission standard in this subpart, other than those alternative monitoring methods which may be authorized pursuant to §§ 63.1510(j)(5) and §§ 63.1510(v), the owner or operator may submit an application to the Administrator. Any such application will be processed according to the criteria and procedures set forth in paragraphs (w)(1) through (6) of this section.
 - a. The Administrator will not approve averaging periods other than those specified in this section.
 - b. The owner or operator must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.

- c. The owner or operator shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in paragraphs (w)(3) (i) through (iii) of this section:
 - i. Data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
 - ii. A description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and
 - iii. Data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
- d. The Administrator will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the Administrator will provide:
 - i. Notice of the information and findings upon which the intended disapproval is based; and
 - ii. Notice of opportunity for the owner or operator to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for the owner or operator to provide additional supporting information.
- e. The owner or operator is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application nor the Administrator's failure to approve or disapprove the application relieves the owner or operator of the responsibility to comply with any provisions of this subpart.
- f. The Administrator may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.
[65 FR 15710, Mar. 23, 2000, as amended at 67 FR 59792, Sept. 24, 2002; 67 FR 79816, Dec. 30, 2002]

D. Reporting Requirements

Issued: To be entered upon final issuance

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than No. 2 fuel oil was burned. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the visible particulate emissions.
3. 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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. Within 120 days after initial start-up, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;
 - c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant;
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT; and
 - f. The start date of construction.
5. Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart RRR, the permittee shall submit a Notification of Compliance Status report that contains the following information:

- a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart RRR;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart RRR.
6. Pursuant to 40 CFR 63.1516(a) *Startup, shutdown, and malfunction plan/reports* the owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
 - b. Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
7. Pursuant to 40 CFR 63.1516(b), *Excess emissions/summary report*. As required by §§ 63.10(e)(3), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in §§ 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no

Issued: To be entered upon final issuance

excess emissions occurred during the reporting period.

- a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
 - i. The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.
 - ii. The corrective action specified in the OM&M plan for a continuous opacity monitoring deviation was not initiated within 1 hour.
 - iii. The corrective action specified in the OM&M plan for visible emissions from an aluminum scrap shredder was not initiated within 1 hour.
 - iv. An excursion of a compliant process or operating parameter value or range (*e.g.*, lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
 - v. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in §§ 63.6(e)(3).
 - vi. An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
 - vii. A deviation from the 3-day, 24-hour, rolling average emission limit for a secondary aluminum processing unit.
- b. Each report must include each of these certifications, as applicable:
 - i. For each thermal chip dryer: "Only unpainted aluminum chips were used as feedstock in any thermal chip dryer during this reporting period."
 - ii. For each dross-only furnace: "Only dross was used as the charge material in any dross-only furnace during this reporting period."
 - iii. For each sidewell group 1 furnace with add-on air pollution control devices: "Each furnace was operated such that the level of molten metal remained above the top of the passage between the sidewell and hearth during reactive fluxing, and reactive flux, except for cover flux, was added only to the sidewell or to a furnace hearth equipped with an add-on air pollution control device for PM, HCl, and D/F emissions during this reporting period."
 - iv. For each group 1 melting/holding furnace without add-on air pollution control devices and using pollution prevention measures that processes only clean charge material: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in §§ 63.1505(i)(2) processed only clean charge during

- this reporting period."
- v. For each group 2 furnace: "Only clean charge materials were processed in any group 2 furnace during this reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during this reporting period."
 - vi. For each in-line fluxer using no reactive flux: "Only nonreactive, non-HAP-containing, non-HAP-generating flux gases, agents, or materials were used at any time during this reporting period."
- c. The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
8. For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
- a. Any period of excess emissions that occurred during the year were reported; and
 - b. All monitoring, recordkeeping, and reporting requirements were met during the year.
9. Pursuant to 40 CFR 63.1515(a), Initial notifications. The owner or operator must submit initial notifications to the applicable permitting authority as described in paragraphs (a)(1) through (7) of this section.
- a. As required by §§ 63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.
 - b. As required by §§ 63.9(b)(3), the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is not required under §§ 63.5(d), must provide notification that the source is subject to the standard.
 - c. As required by §§ 63.9(b)(4), the owner or operator of a new or reconstructed major affected source that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is required by §§ 63.5(d) must provide the following notifications:
 - i. Intention to construct a new major affected source, reconstruct a major source, or reconstruct a major source such that the source becomes a major affected source;
 - ii. Date when construction or reconstruction was commenced (submitted simultaneously with the application for approval of construction or reconstruction if

Issued: To be entered upon final issuance

construction or reconstruction was commenced before the effective date of this subpart, or no later than 30 days after the date construction or reconstruction commenced if construction or reconstruction commenced after the effective date of this subpart);

- iii. Anticipated date of startup; and
 - iv. Actual date of startup.
- d. As required by §§ 63.9(b)(5), after the effective date of this subpart, an owner or operator who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, must provide notification of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by §§ 63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.
- i. The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or reconstruction commences after the effective date of this subpart; or
 - ii. The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
- e. As required by §§ 63.9(d), the owner or operator must provide notification of any special compliance obligations for a new source.

- f. As required by §§ 63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
 - g. As required by §§ 63.9(g), the owner or operator must provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.
10. Pursuant to 40 CFR 63.1515(b), Notification of compliance status report. Each owner or operator of an existing affected source must submit a notification of compliance status report within 60 days after the compliance date established by §§ 63.1501(a). Each owner or operator of a new affected source must submit a notification of compliance status report within 90 days after conducting the initial performance test required by §§ 63.1511(b), or within 90 days after the compliance date established by §§ 63.1501(b) if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (a)(1) through (10) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(l) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
- a. All information required in §§ 63.9(h). The owner or operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
 - b. The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).
 - c. Unit labeling as described in §§ 63.1506(b), including process type or furnace classification and operating requirements.
 - d. The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (*e.g.*, lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
 - e. Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in §§ 63.1506(c).

- f. If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in §§ 63.1510(f).
 - g. Manufacturer's specification or analysis documenting the design residence time of no less than 1 second for each afterburner used to control emissions from a scrap dryer/delacquering kiln/decoating kiln subject to alternative emission standards in §§ 63.1505(e).
 - h. Manufacturer's specification or analysis documenting the design residence time of no less than 0.8 second and design operating temperature of no less than 1,600 °F for each afterburner used to control emissions from a sweat furnace that is not subject to a performance test.
 - i. The OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
 - j. Startup, shutdown, and malfunction plan, with revisions.
12. Pursuant to 40 CFR 63.1516(c), Annual compliance certifications. For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
- a. Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by this subpart; and
 - b. All monitoring, recordkeeping, and reporting requirements were met during the year.
13. Pursuant to 40 CFR 63.1517(a), as required by §§ 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
 - b. The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and
 - c. The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
14. Pursuant to 40 CFR 63.1517(b), in addition to the general records required by §§ 63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain records of:
- a. For each affected source and emission unit with emissions controlled by a fabric filter or a lime-injected fabric filter:

Issued: To be entered upon final issuance

- i. If a bag leak detection system is used, the number of total operating hours for the affected source or emission unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.
- ii. If a continuous opacity monitoring system is used, records of opacity measurement data, including records where the average opacity of any 6-minute period exceeds 5

Issued: To be entered upon final issuance

- percent, with a brief explanation of the cause of the emissions, the time the emissions occurred, the time corrective action was initiated and completed, and the corrective action taken.
- iii. If an aluminum scrap shredder is subject to visible emission observation requirements, records of all Method 9 observations, including records of any visible emissions during a 30-minute daily test, with a brief explanation of the cause of the emissions, the time the emissions occurred, the time corrective action was initiated and completed, and the corrective action taken.
- b. For each affected source with emissions controlled by an afterburner:
 - i. Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken; and
 - ii. Records of annual afterburner inspections.
 - c. For each scrap dryer/delacquering kiln/decoating kiln and group 1 furnace, subject to D/F and HCl emission standards with emissions controlled by a lime-injected fabric filter, records of 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the 3-hour block average temperature exceeds the compliant operating parameter value +14 °C (+25 °F), with a brief explanation of the cause of the excursion and the corrective action taken.
 - d. For each affected source and emission unit with emissions controlled by a lime-injected fabric filter:
 - i. Records of inspections at least once every 8-hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 4-hour period for the subsequent 3 days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;
 - ii. If lime feeder setting is monitored, records of daily inspections of feeder setting, including records of any deviation of the feeder setting from the setting used in the performance test, with a brief explanation of the cause of the deviation and the corrective action taken.
 - iii. If lime addition rate for a noncontinuous lime injection system is monitored pursuant to the approved alternative monitoring requirements in §§ 63.1510(v), records of the time and mass of each lime addition during each operating cycle or time period used in the performance test and calculations of the average lime

addition rate (lb/ton of feed/charge).

- e. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- f. For each continuous monitoring system, records required by §§ 63.10(c).
- g. For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- h. Approved site-specific monitoring plan for a group 1 furnace without add-on air pollution control devices with records documenting conformance with the plan.
- i. Records of all charge materials for each thermal chip dryer, dross-only furnace, and group 1 melting/holding furnaces without air pollution control devices processing only clean charge.
- j. Operating logs for each group 1 sidewell furnace with add-on air pollution control devices documenting conformance with operating standards for maintaining the level of molten metal above the top of the passage between the sidewell and hearth during reactive flux injection and for adding reactive flux only to the sidewell or a furnace hearth equipped with a control device for PM, HCl, and D/F emissions.
- k. For each in-line fluxer for which the owner or operator has certified that no reactive flux was used:
 - i. Operating logs which establish that no source of reactive flux was present at the in-line fluxer;
 - ii. Labels required pursuant to §§ 63.1506(b), which establish that no reactive flux may be used at the in-line fluxer; or
 - iii. Operating logs which document each flux gas, agent, or material used during each operating cycle.
- l. Records of all charge materials and fluxing materials or agents for a group 2 furnace.
- m. Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.
- n. Records of annual inspections of emission capture/collection and closed vent systems.
- o. Records for any approved alternative monitoring or test procedure.

Emissions Unit ID: **P001**

- p. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
- i. Startup, shutdown, and malfunction plan;
 - ii. OM&M plan; and
 - iii. Site-specific secondary aluminum processing unit emission plan (if applicable).

Issued: To be entered upon final issuance

- q. For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour, rolling average emissions.
[65 FR 15710, Mar. 23, 2000, as amended at 67 FR 79818, Dec. 30, 2002]

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
The particulate emissions (PE) shall not exceed 5.16 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated using Method 5, 40 CFR Part 60, Appendix A. In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PE emission rates for the unit utilizing the following equation:

$$E = EF \times Al/Hrs \times \text{ton}/2,000 \text{ lbs}$$

where;

E = Particulate emission rate, in pounds per hour.

EF = Emission factor of 1.1 pounds of particulate per ton of material processed is taken from the STAPPA and ALAPCO Handbook, Table 11-2 for melting clean aluminum metal.

Al = Amount of aluminum charged, in tons.

Hrs = The number of hours.

- b. Emissions Limitation:
The particulate emissions (PE) shall not exceed 22.6 tons/yr.

Applicable Compliance Method:

The 22.6 TPY limitation was developed by multiplying the hourly emission rate of 5.16 lbs/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emissions Limitation:
The nitrogen oxide (NOx) shall not exceed 2.06 lbs/hr.

Applicable Compliance Method:

To determine the actual hourly emission rate for NOx from natural gas combustion, the

Issued: To be entered upon final issuance

following equation shall be used:

$$E = \text{Max.} \times EF$$

where;

E = NOx emission rate, in pounds per hour.

Max. = Maximum rating of P001 is 3.864 mmBTU/hour.

EF = Emission factor of 0.533 lb/mmBTU shall be used. This EF is taken from the STAPPA and ALAPCO Handbook

- d. Emissions Limitation:
The nitrogen oxide (NOx) shall not exceed 9.02 tons/yr.

Applicable Compliance Method:

The 9.02 tons/yr limitation was developed by multiplying the hourly emission rate of 2.06 lbs/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emissions Limitation:
The sulfur dioxide (SO₂) shall not exceed 2.15 lbs/hr.

Applicable Compliance Method: To determine the actual hourly emission rate for SO₂ from natural gas combustion, the following equation shall be used:

$$E = \text{Max.} \times EF$$

where;

E = SO₂ emission rate, in pounds per hour.

Max. = Maximum rating of P001 is 3.864 mmBTU/hour.

EF = Emission factor of 0.556 lb/mmBTU shall be used. This EF is taken from the STAPPA and ALAPCO Handbook

- f. Emissions Limitation:
The sulfur dioxide (SO₂) shall not exceed 9.42 tons/yr.

Applicable Compliance Method:

The 9.42 tons/yr limitation was developed by multiplying the hourly emission rate of 2.15 lbs/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- g. Emissions Limitation:
 The carbon monoxide (CO) shall not exceed 0.02 lb/hr.
- Applicable Compliance Method: To determine the actual hourly emission rate for CO from natural gas combustion, the following equation shall be used:
- $$E = \text{Max.} \times \text{EF}$$
- where;
- E = CO emission rate, in pounds per hour.
- Max. = Maximum rating of P001 is 3.864 mmBTU/hour.
- EF = Emission factor of 0.004 lb/mmBTU shall be used. This EF is taken from the STAPPA and ALAPCO Handbook
- h. Emissions Limitation:
 The carbon monoxide (CO) shall not exceed 0.09 ton/yr.
- Applicable Compliance Method:
 The 0.09 ton/yr limitation was developed by multiplying the hourly emission rate of 0.02 lb/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- i. Emissions Limitation:
 The organic compound (OC) shall not exceed 0.08 lb/hr.
- Applicable Compliance Method: To determine the actual hourly emission rate for OC from natural gas combustion, the following equation shall be used:
- $$E = \text{Max.} \times \text{EF}$$
- where;
- E = OC emission rate, in pounds per hour.
- Max. = Maximum rating of P001 is 3.864 mmBTU/hour.
- EF = Emission factor of 0.02 lb/mmBTU shall be used. This EF is taken from the STAPPA and ALAPCO Handbook
- j. Emissions Limitation:
 The organic compound (OC) shall not exceed 0.35 ton/yr.
- Applicable Compliance Method:
 The 0.35 ton/yr limitation was developed by multiplying the hourly emission rate of 0.08

Emissions Unit ID: **P001**

lb/hour by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- k. Emissions Limitation
15 g of dioxin/furan TEQ per Mg (2.1×10^{-4} gr of dioxin/furan TEQ per ton) of feed/charge

Applicable Compliance Method

Prior to conducting the performance test, the permittee must prepare a site-specific test plan which satisfies all of the requirements and must obtain approval of the plan pursuant to the procedures set forth in 40 CFR 63.7(c).

- l. Emissions Limitation:
Visible particulate emissions shall not exceed 5% opacity, as a 6-minute average

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The Initial Performance Test shall be conducted within 90 days after start-up of the emissions unit;
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate for dioxins/furans and particulate;
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for the concentration of dioxins/furans at the outlet of the afterburner, Method 23 of 40 CFR Part 60, Appendix A and for particulate matter, Method 5 of 40 CFR Part 60, Appendix A;
 - d. The permittee must conduct each test while the emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit; and
 - e. The testing shall follow the procedures outlined in 40 CFR 63.1511(b) and 40 CFR 63.1512(c).
 - f. The owner or operator must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
 - g. Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.
 - h. Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.
 - i. Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.
 - j. Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

- k. Alternative methods. The owner or operator may use an alternative test method, subject to approval by the Administrator.

Issued: To be entered upon final issuance

- l. Repeat tests. The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
- m. Testing of representative emission units. With the prior approval of the permitting authority, an owner or operator may utilize emission rates obtained by testing a particular type of group 1 furnace which is not controlled by any add-on control device, or by testing an in-line flux box which is not controlled by any add-on control device, to determine the emission rate for other units of the same type at the same facility. Such emission test results may only be considered to be representative of other units if all of the following criteria are satisfied:
 - i. The tested emission unit must use feed materials and charge rates which are comparable to the emission units that it represents;
 - ii. The tested emission unit must use the same type of flux materials in the same proportions as the emission units it represents;
 - iii. The tested emission unit must be operated utilizing the same work practices as the emission units that it represents;
 - iv. The tested emission unit must be of the same design as the emission units that it represents; and
 - v. The tested emission unit must be tested under the highest load or capacity reasonably expected to occur for any of the emission units that it represents.
- n. Establishment of monitoring and operating parameter values. The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by §§ 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by §§ 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:
 - i. The complete emission test report(s) used as the basis of the parameter(s) is submitted.
 - ii. The same test methods and procedures as required by this subpart were used in the test.
 - iii. The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the

Issued: To be entered upon final issuance

- report; and
- iv. All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.
- o. Group 1 furnace (including melting holding furnaces) without add-on air pollution control devices. In the site-specific monitoring plan required by §§ 63.1510(o), the owner or operator of a group 1 furnace (including a melting/holding furnaces) without add-on air pollution control devices must include data and information demonstrating compliance with the applicable emission limits.
- i. If the group 1 furnace processes other than clean charge material, the owner or operator must conduct emission tests to measure emissions of PM, HCl, and D/F at the furnace exhaust outlet.
 - ii. If the group 1 furnace processes only clean charge, the owner or operator must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the group 1 furnace (including a melting/holding furnace) processes only clean charge.
 - iii. The owner or operator may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.
- p. Secondary aluminum processing unit. The owner or operator must conduct performance tests as described in paragraphs (j)(1) through (3) of this section. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and $\mu\text{g TEQ/Mg}$ of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour, rolling average emission rates using the equation in §§ 63.1510(t). A performance test is required for:
- i. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
 - (a) Emissions of HCl (for the emission limit); or
 - (b) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
 - ii. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
 - (a) Emissions of HCl (for the emission limit); or

- (b) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
 - iii. Each in-line fluxer to measure emissions of PM and HCl.
 - q. Feed/charge weight measurement. During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.

Issued: To be entered upon final issuance

- r. Continuous opacity monitoring system. The owner or operator of an affected source or emission unit using a continuous opacity monitoring system must conduct a performance evaluation to demonstrate compliance with Performance Specification 1 in appendix B to 40 CFR part 60. Following the performance evaluation, the owner or operator must measure and record the opacity of emissions from each exhaust stack for all consecutive 6-minute periods during the PM emission test.
- s. Labeling. The owner or operator of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace and in-line fluxer must submit the information described in §§ 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in §§ 63.1506(b).
- t. PM, HCl and D/F emission limits. Use Equation 7 to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = C \times Q \times K_1 / P$$

Where,

E = Emission rate of PM, HCl, or D/F, kg/Mg (lb/ton) of feed;

C = Concentration of PM, HCl, or D/F, g/dscm (gr/dscf);

Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);

K1 = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and

P = Production rate, Mg/hr (ton/hr).

- 3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit's 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 Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton 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.

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 Canton 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 Canton local air agency.

The permittee shall use equation 7 of 40 CFR 63.1513(b) to determine compliance with the dioxin/furan emissions limit:

$$E = (C \times Q \times K) / P$$

GNW Aluminum, Inc.
PTI A
Issued

Facility ID: 1576001922

Emissions Unit ID: **P001**

Where,

E = Emission rate of dioxin/furan in kg/Mg (lb/ton) of feed/charge;
C = Concentration of dioxin/furan g/dscm (gr/dscf);

GNW

PTI A

Emissions Unit ID: P001

Issued: To be entered upon final issuance

Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);
K = Conversion Factor, 1 kg/1000 g (1 lb/7000 gr); and
P = Production rate, Mg/hr (ton/hr)

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee to apply for and obtain a new modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.