



# Air Operating Permit

Issued in accordance with:  
40 CFR Part 70, Chapter 70.94  
RCW, and Chapter 173-401 WAC

**3104 E. Augusta, Spokane, WA 99207 (509) 477-4727**

PERMIT NO: AOP-11 RENEWAL #1

ISSUANCE DATE: MAY 19, 2008

REVISED: NOVEMBER 15, 2010

EXPIRATION DATE: MAY 18, 2013

PERMITTEE: Kaiser Aluminum Fabricated Products, LLC  
PO Box 15108  
Spokane Valley, WA 99215-5108

FACILITY LOCATION: Trentwood Works  
15000 E Euclid Avenue  
Spokane Valley, WA 99215

and

Alutek  
3401 N Tschirley  
Spokane Valley, WA 99216

FACILITY DESCRIPTION: Aluminum Sheet and Plate Rolling Mill

PRIMARY SIC: 3353

AIRS AFS NO: WA-063-0023

RESPONSIBLE OFFICIAL WHO SUBMITTED APPLICATION: Michael Zerga  
VP Flat Rolled Products

FACILITY CONTACT: Sarah Scott  
Sr. Environmental Engineer  
(509) 927-6122

PREPARED BY: \_\_\_\_\_  
April Westby

REVIEWED BY: \_\_\_\_\_  
April Westby, PE

REVIEWED BY: \_\_\_\_\_  
Ronald J. Edgar, Chief of Technical Services

APPROVED BY: \_\_\_\_\_  
William Dameworth, Control Officer

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## LIST OF ABBREVIATIONS

BACT	Best available control technology
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was called SCAPCA)
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS & PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 10/4/93]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 10/4/93]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(22), 9/13/96]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(23), 9/13/96]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 10/4/93]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 9/13/96]
Operating Hour	An Operating Hour means any 60-minute period in which charging, melting, fluxing, skimming, holding, or discharging processes are occurring in a furnace. [Order 91-01, Condition 5, 12/12/91]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

The following note applies throughout this permit when indicated by the term “\* - see note on page 5.”

**NOTE:** For requirements which are federally enforceable because of inclusion in the State Implementation Plan (SIP), where the current filing date in the regulation is different from the filing date for SIP approved version, but the requirement itself has not changed, the most recent filing date is given, followed by the SIP version in parentheses.

Until this permit expires, is modified, or revoked, the permittee, Kaiser Aluminum Fabricated Products, LLC (KAFP), is authorized to operate subject to the terms and conditions listed herein.

## I. STANDARD TERMS & CONDITIONS

### A. PERMIT ADMINISTRATION

**1. Federal Enforceability.** All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA. [WAC 173-401-625, 10/4/93]

**2. Duty to comply.** The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70.94 RCW, and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

**3. Schedule of Compliance.** The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 10/4/93]

**4. Need to Halt or Reduce Activity Not a Defense.** 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 conditions of this permit. [WAC 173-401-620(2)(b), 10/4/93]

**5. Permit Actions.** This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 10/4/93]

**6. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a. Additional requirements become applicable to the facility and the remaining permit term is three or more years. Such reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition 15- Permit Continuation below);
- b. SRCAA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- c. SRCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

**7. Emissions Trading.** No permit revision shall be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 10/4/93]

**8. Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

**9. Duty to provide information.** The permittee shall furnish within a reasonable time to SRCAA, any information that SRCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to SRCAA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SRCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 10/4/93]

**10. Duty to Supplement or Correct Application.** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. [WAC 173-401-500(6), 9/16/02]

**11. Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]

**12. Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 10/4/93]

**13. Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from, and additional to, any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

**14. Permit Renewal and Expiration.** This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SRCAA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SRCAA's receipt of a timely and complete application, the facility may continue to operate subject to final action by SRCAA on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SRCAA, any additional information identified as necessary to process the application. The application shall be sent to:

Director  
Spokane Regional Clean Air Agency  
3104 E. Augusta  
Spokane WA 99207

[WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1), 9/16/02]

**15. Permit Continuation.** This permit and all terms and conditions contained herein, including any permit shield provided under Condition 16- Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

**16. Permit Shield.** Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance, provided such applicable requirements are included and are specifically identified in the permit. This provision does not apply to any insignificant emissions units or activities designated under WAC 173-401-530.

This permit shield shall not alter or affect the following:

- a. the provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. the ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;

d. the ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

(See III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

## **B. INSPECTION & ENTRY**

**17. Inspection and Entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SRCAA, or an authorized representative, to perform the following:

a. enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

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

d. as authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 10/4/93] [NOC #1322, Condition 9, 2/8/06, as revised on 10/30/09] [NOC #1334, Condition 9, 2/21/06, as revised on 11/16/07 and 10/30/09] [NOC #1335, Condition 11, 2/21/06] [NOC #1366, Condition 9, 10/27/06, as revised on 10/30/09] [NOC #1316, Condition 12, 11/7/05] [NOC #1410, Condition 22, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 22, 7/18/08, as revised on 10/30/09 and 10/30/09]

Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

**18. Obstruction of Access.** No person shall obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY]

## C. EMERGENCY PROVISIONS

**19. Emergencies.** An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met and the permittee submits notification of the emergency to SRCAA according to the shortest time period which applies to the situation as follows (See Condition 30 - Prompt Reporting of Deviations):

- a. As soon as possible, but no later than 12 hours after the emissions are discovered, if the emissions represent a potential threat to human health or safety;
- b. Within two working days of the time that the emissions limits were exceeded due to the emergency; or
- c. Within a shorter period of time if specified in an applicable requirement.

This provision is in addition to the affirmative defense for unavoidable excess emissions found in Condition 20 - Excess Emissions and Condition 21- Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

**20. Excess Emissions.** If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions shall be excused and not subject to penalty, if

- a. the excess emissions are reported to SRCAA on the next regular working day;
- b. upon request by SRCAA, the permittee submits a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence; and
- c. the permittee adequately demonstrates to SRCAA's control officer that:
  - i. Excess emissions due to startup or shutdown conditions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
  - ii. Excess emissions due to scheduled maintenance could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
  - iii. For excess emissions due to upsets, the event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition; the event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and the operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking

into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107, 8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

**21. Report of Breakdown.** If pollutants are emitted in excess of the limits established by Regulation I of SRCAA as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if:

- a. the upset or breakdown is reported to SRCAA on the next regular working day;
- b. the permittee, upon request of SRCAA's control officer, submits a report giving: the causes; the steps to be taken to repair the breakdown; and a time schedule for the completion of the repairs; and
- c. the permittee can prove to SRCAA's control officer that the excess emissions were unavoidable by adequately demonstrating that: the event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition; the event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and the operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emissions unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

- a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with Regulation I of the SRCAA or be subject to the penalties in Regulation I of the SRCAA, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints.
- b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements. [SRCAA Regulation I, Section 6.08, 3/4/04 - STATE/LOCAL ONLY ]

**22. Data Recovery.** For the monitoring provisions in this permit, implemented pursuant to WAC 173-401-615, which indicate that these data recovery provisions apply, the permittee shall recover valid monitoring data, as follows:

1. For records or monitoring data that are required daily or more frequently, the permittee shall collect at least 90% of all records or data required in

a month.

2. For records or monitoring data that are required monthly or more frequently (but less frequently than daily), the permittee shall collect at least nine of the most recent ten required records.

Periods that the monitoring process does not operate and periods during which an unavoidable monitoring system malfunction occurred are not included in the data recovery calculation to determine if the provisions of 1. and 2. above were met. In determining whether a monitoring system malfunction was unavoidable, the following criteria shall be considered:

- a. Whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
- b. Whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and
- c. Whether the permittee took appropriate action as expeditiously as practicable to correct the malfunction.

A report shall be filed with SRCAA no later than 30 days after the end of the monitoring period during which the provisions of 1. and/or 2. above were not met. The report shall provide the reason(s) the data were not collected (e.g., a description of the monitoring system malfunction, etc.), information regarding operation of the monitored process during the periods with missing data (e.g., process parameters which would be indicative of the compliance status of the process with applicable requirements), information regarding a., b., and c. of this condition, and any further actions that the permittee will take to ensure adequate collection of such data in the future.

Each condition in Section II.J – MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS to which this condition applies shall clearly indicate that these data recovery provisions apply. [WAC 173-401-615(1)(b), 9/16/02]

**23. Monitoring System Malfunctions.** The permittee may be temporarily exempted from monitoring and reporting requirements, required under the provisions of Chapter 173-400 WAC during periods of monitoring system malfunctions, provided the permittee can demonstrate that the malfunction was unavoidable and repaired as expeditiously as practicable.

Each condition in Section II. – MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS to which this condition applies shall clearly indicate that this monitoring system malfunction provision applies. [WAC 173-400-105(5)(h), 8/25/02(8/20/93)\* - see note on page 5]

## D. GENERAL MONITORING, RECORDKEEPING, & REPORTING

**24. Records of Required Monitoring Information.** The permittee shall keep records of monitoring information including:

- a. the date, place as defined in this permit, and time of sampling and measurements;
- b. the date(s) analyses were performed;
- c. the company or entity that performed the analyses;
- d. the analytical techniques or methods used;
- e. the results of such analyses; and
- f. the operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

**25. Permanent Shutdown of an Emission Unit.** If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shut down emission unit, generated while the emission unit was in operation, shall be kept in accordance with Conditions 24- Records of Required Monitoring Information and 28 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall be reported to SRCAA on the monitoring report, required under Condition 29 – Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

**26. Operational Flexibility.** In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

**27. Records of Changes.** The permittee shall keep records of 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 nature and quantity of emissions resulting from those changes. [WAC 173-401-615(2)(b), 9/16/02]

**28. Retention of Records.** The permittee shall keep records of all required monitoring data and information supporting the data for a period of five years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original “hard copy” recordings for continuous monitoring

instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2)(c), 9/16/02]

**29. Monitoring Reports.** Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SRCAA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

All instances of deviations from permit requirements shall be clearly identified in such reports. In addition, any permanent emission unit shutdowns shall be reported in accordance with Condition 25- Permanent Shutdown of an Emission Unit, above. The reports shall be certified as required in Condition 33- Report Submittals. Provided, where this permit requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. [WAC 173-401-615(3)(a), 9/16/02]

**30. Prompt Reporting of Deviations.** The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt means reporting according to the shortest time period listed below which applies to the situation:

- a. In the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. In the case where an affirmative defense is sought under Condition 19 - Emergencies above or under Condition 20 - Excess Emissions, the deviation shall be reported by phone or facsimile within two working days of the time when emission limitations were exceeded; and
- c. For all other deviations, the deviation shall be reported as part of the next monthly monitoring report.

The permittee shall maintain a contemporaneous record of all deviations. [WAC 173-401-615(3)(b), 9/16/02]

**31. Emission Inventory.** The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of total particulate matter, PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants, and shall be submitted no later than one hundred five days after the end of the calendar year. The permittee shall maintain records of information

necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions credit for materials recycled or disposed of as waste shall be allowed if records documenting the amount of material recycled / disposed are kept and submitted with the inventory of emissions. [WAC 173-400-105(1), 1/10/05(8/20/93)\* - see note on page 5]

**32. WAC 173-401-530(1)(a) Insignificant Emission Units.** Emission units or activities which qualify as insignificant, solely on the basis of WAC 173-401-530(1)(a), shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725. Upon request from SRCAA, and according to a deadline established by SRCAA, the permittee shall demonstrate, through submission of emissions data, that the actual emissions of such a unit or activity are below the applicable emission thresholds. SRCAA shall include in its request a deadline by which the permittee shall submit the emissions data. [WAC 173-401-530(6), 9/16/02]

**33. Report Submittals.** All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director  
Spokane Regional Clean Air Agency  
3104 E. Augusta  
Spokane, WA 99207

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

**34. Rendering Device or Method Inaccurate.** The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 1/10/05(8/20/93)\* - see note on page 5]

## **E. COMPLIANCE CERTIFICATION**

**35. Compliance Certification Submittals.** The permittee shall submit compliance certifications once per year to SRCAA in accordance with Condition 33 - Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SRCAA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 10/4/93]

**36. Compliance Certification Contents.** The compliance certification shall include:

- a. The identification of each term or condition of the permit that is the basis of the certification;
- b. The compliance status;
- c. Whether compliance was continuous or intermittent;
- d. The method(s) used for determining the compliance status of the source, currently and over the reporting period, consistent with WAC 173-401-615(3)(a) (see Condition 29 - Monitoring Reports above); and
- e. Such other facts as SRCAA may, in writing, require from the permittee to determine the compliance status of the source.

For conditions of the permit that are based on requirements given in 40 CFR Part 63, Subpart RRR, the permittee must certify continuous compliance based upon, but not limited to, all monitoring, recordkeeping, and reporting requirements were met during the year.

Where this permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where this permit requires testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping and reporting, required by the permit, revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-630(5)(c), 10/4/93] [40 CFR §63.1516(c), 4/20/06] [WAC 173-400-075(5), 5/8/07]

**37. Submittal to EPA.** The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator  
USEPA  
MS OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

[WAC 173-401-630(5)(d), 10/4/93]

## **F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS**

**38. False Information.** The permittee shall not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(7), 1/10/05 (8/20/93)\* - see note on page 5]

**39. Falsification of Statements.** The permittee shall not willfully make a false or misleading statement to the Board of Directors of SRCAA or their authorized representatives as to any matter within the jurisdiction of the Board. [SRCAA Regulation I, 2.08.A, 8/3/06 - STATE/LOCAL ONLY]

**40. Alteration of Documents.** The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SRCAA if the purpose of such reproduction or alteration is to evade or violate any provision of SRCAA Regulation I or any other law. [SRCAA Regulation I, 2.08.B, 8/3/06- STATE/LOCAL ONLY]

**41. Availability of Documents.** Any order required to be obtained by SRCAA Regulation I shall be available for inspection on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/06- STATE/LOCAL ONLY]

**42. Posting of Notices.** In the event SRCAA requires a notice to be displayed, it shall be posted. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors or their authorized representative. [SRCAA Regulation I, 2.08.D, 8/3/06- STATE/LOCAL ONLY]

## **G. APPLICABLE WHEN TRIGGERED REQUIREMENTS**

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement, proposes changes to the source that trigger the applicability of the requirement, or if the requirement is triggered by the action specified in the condition. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition 35- Compliance Certification Submittals shall describe the permittee's compliance with these requirements.

**43. New Source Review.** Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, -112, -113, 8/15/01 – STATE/LOCAL ONLY] . [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

**44. Replacement or Substantial Alteration of Existing Control Equipment.** Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

**45. Demolition and Renovation (Asbestos).** The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2001] [WAC 173-400-075, 5/8/07] [SRCAA Regulation I, Article IX, 8/6/09 - STATE/LOCAL ONLY]

**46. Source Testing.** To demonstrate compliance, Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 Appendix A which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of July 12, 1990, on file at Ecology. The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 15 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation. [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 8/15/01] [SRCAA Regulation I, Section 2.09, 2/7/08]

**47. Source Testing for Revised SRCAA Orders #96-03, #96-04, #96-05, #96-06.** SRCAA may require testing to verify compliance with the emission limitations of SRCAA Orders #96-03, #96-04, #96-05, and #96-06. Testing shall be done in accordance with EPA reference methods as found in 40 CFR Part 51 and 60 (1995). PM10 emissions shall be assumed to equal PM emissions unless the permittee provides appropriate technical documentation to demonstrate otherwise.

- a. For SRCAA Order #96-03, emissions shall be determined from the average of three valid test runs, each representing one furnace cycle, and shall include front half and back half particulate matter.
- b. For SRCAA Orders #96-04, #96-05, and #96-06, PM and/or PM10 emissions shall be determined from the average of three valid 1-hour, or longer, test runs and shall include front and back half particulate matter. PM10 emissions shall be assumed to equal PM emissions unless the permittee provides appropriate technical documentation to demonstrate otherwise.

[SRCAA Order #96-03, Condition D & E, 4/24/96 as revised on 10/4/00] [SRCAA Order #96-04, Condition A, 4/24/96 as revised on 5/8/96] [SRCAA Order #96-05, Condition C, 4/24/96 as revised on 5/8/96 and 10/4/00] [SRCAA Order #96-06, Condition B, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00]

**48. Chemical Accident Prevention Provisions.** If regulated substances are stored on-site in quantities, at the process level, that are above the threshold quantities established in 40 CFR §68.130, the permittee shall comply with the provisions of 40 CFR Part 68 - Chemical Accident Prevention Provisions. [40 CFR Part 68, 1999]

**49. Source Emission Reduction Plan.** If SRCAA or the governor declares a “forecast,” “alert,” “warning,” or “emergency” air pollution episode stage under Chapter 173-435 WAC, the permittee shall comply with the Source Emission Reduction Plan, issued by Ecology, dated March 5, 1973. [Chapter 173-435 WAC and Source Emission Reduction Plan, dated 3/5/73]

## **II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS**

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to assure compliance with the requirement are listed in the sixth columns of the emission limitation tables. The MRRR are given at the end of this section.

Some facility-wide requirements may be repeated in emission limitation tables for individual emission units or groups of emission units if additional monitoring is required for that emission unit or group of emission units. Facility-wide requirements apply to all emission units regardless of whether they are listed in every emission limitations table unless otherwise exempted in III. PERMIT SHIELD.

### **A. FACILITY-WIDE EMISSION LIMITATIONS**

TABLE II.A-1 lists the applicable emission limitations that apply facility-wide. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

The facility-wide emission limitations apply to insignificant emissions units. However, the monitoring, recordkeeping and reporting requirements given in II.J. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 32). [WAC 173-401-530(2)(c) & (d), 9/16/02]

TABLE II.A-1 - Facility-wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
50	WAC 173-400-040, 8/20/93 WAC 173-400-040, 1/10/05 – STATE/LOCAL ONLY	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040 – STATE/LOCAL ONLY			No MRRR required
51	WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05 (8/20/93) <sup>1</sup> * - see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period  During soot blowing / grate cleaning, 15 minute aggregate for any 8 hour period	1M, 2M, 47M
52	SRCAA Regulation I, 6.02, 9/1/05 - STATE/LOCAL ONLY <sup>1</sup>	Visible Emissions shall not equal or exceed 20%, as specified in Regulation I of SRCAA, Section 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period  During soot blowing / grate cleaning, 15 minute aggregate for any 8 hour period	1M, 2M, 47M
53	WAC 173-400-040(2), 1/10/05 - STATE/LOCAL ONLY  SRCAA Regulation I, Section 6.05.A, 3/4/04(11/12/93)* -	No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and			3M

<sup>1</sup> The 20% opacity limits in WAC 173-400-040(1) and SRCAA Regulation I, Section 6.02 do not apply to the melters and holders regulated under SRCAA Order #91-01, NOC #1410, and NOC #1427. For these units, the opacity limits in Conditions 71-73 supersede this opacity requirement as allowed under WAC 173-400-040(1)(d) and SRCAA Regulation I, Section 6.02.A.4. [SRCAA Order #91-01, Condition 9, 12/12/91] [NOC #1410, Condition 4, 4/28/08, as revised on 10/30/09] [NOC #1427, Condition 4, 7/18/08, as revised on 10/30/09]

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	see note on page 5	enjoyment of the property upon which the material is deposited.			
54	<p>SRCAA Regulation I, Section 6.05.C, 3/4/04(11/12/93)* - see note on page 5</p> <p>SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)* - see note on page 5</p> <p>WAC 173-400-040(3)(a), 1/10/05(11/12/93)* - see note on page 5</p> <p>SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)* - see note on page 5</p> <p>WAC 173-400-040(8)(a), 1/10/05(8/20/93)* - see note on page 5</p>	<p>Reasonable precautions must be taken to:</p> <p>a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;</p> <p>b. Prevent tracking of PM onto paved roadways open to the public;</p> <p>c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA;</p> <p>d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and</p> <p>e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.</p>			3M
55	WAC 173-400-040(4), 1/10/05 – STATE / LOCAL ONLY	Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4) – STATE / LOCAL ONLY			3M
56	SRCAA Regulation I, Section 6.04, 4/2/10-STATE/LOCAL ONLY	<p>It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be:</p> <p>a. Injurious to the health and safety of human, animal or plant life;</p> <p>b. Injurious or cause damage</p>			3M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		<p>to property; or</p> <p>c. Which unreasonably interferes with enjoyment of life and property.</p> <p>Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04 (4/2/10)</p> <p>STATE / LOCAL ONLY</p>			
57	<p>WAC 173-400-040(5), 1/10/05(8/20/93)* - see note on page 5</p> <p>SRCAA Regulation I, Section 6.06.A, 3/4/04-STATE/LOCAL ONLY</p>	<p>No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business- STATE/LOCAL ONLY</p>			3M
58	<p>WAC 173-400-040(7), 8/15/01(8/20/93)* - see note on page 5</p> <p>SRCAA Regulation I, 6.07, 3/4/04-STATE/LOCAL ONLY</p>	<p>No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC - STATE/LOCAL ONLY</p>			No MRRR required
59	<p>WAC 173-400-050(1) &amp; WAC 173-400-050(3), 8/15/01(2/19/91)* - see note on page 5</p> <p>NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SRCAA to be representative of normal operations.</p>	<p>Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) &amp; WAC 173-400-050(3).</p> <p>NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SRCAA to be representative of normal operations.</p>	<p>RM 5 (1995) or procedures in WAC 173-400-050 approved per Condition 46- Source Testing</p>	<p>average of three one-hour tests</p>	1M
60	WAC 173-400-060,	Particulate matter emissions	RM 5	average of	1M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	2/19/91 WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY	from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	(1995) or procedures in WAC 173-400-060 approved per Condition 46- Source Testing	three one-hour tests	
61	WAC 173-400-040(6), 1/10/05(8/20/93)* - see note on page 5  NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY	SO2 emissions from each unit shall not exceed 1000 ppm on a dry basis, corrected to 7% oxygen, as specified in WAC 173-400-040(6).  NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY	Procedures in WAC 173-400-105(4) approved per Condition 46- Source Testing	any period of 60 consecutive minutes	4M
62	WAC 173-400-200, 1/10/05(2/19/91)* - see note on page 5	No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200.			No MRRR required
63	WAC 173-400-200, 2/19/91	No dispersion techniques shall be used to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200.			No MRRR required
64	WAC 173-400-205, 2/19/91	No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205.			No MRRR required
65	Chapter 173-425 WAC, 3/13/00(10/18/90)* - see note on page 5  SRCAA Regulation I, Section 6.01, 3/4/04 - STATE/LOCAL ONLY	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA Regulation I, Section 6.01.			No MRRR required
66	40 CFR Part 82, 2006	Handling and use of ozone-depleting substances must be			No MRRR required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		in accord with 40 CFR Part 82.			
67	40 CFR Part 68, 2006	The permittee shall comply with the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions.			No MRRR required
68	SRCAA Order #03-01, Condition 1, 3/3/03	Facility-wide emissions of each individual HAP, listed in or pursuant to Section 112(b) of the Federal Clean Air Act, shall not exceed 19,000 pounds (9.5 tons) during any rolling twelve month period.			37M, 38M, 39M
69	SRCAA Order #03-01, Condition 2, 3/3/03	Facility-wide combined emissions of all HAPs, listed in or pursuant to Section 112(b) of the Federal Clean Air Act, shall not exceed 48,000 pounds (24 tons) during any rolling twelve month period.			37M, 38M, 39M

**B. REMELT AREA EMISSION LIMITATIONS**

This section of the permit covers the remelt area and associated activities. The units covered are listed in Table II.B-1.

Table II.B-1 – Remelt Area

Description	Kaiser ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
DC1 Melter, cold fired - 40 MMBTU/hr – no NOC issued	RM-M1	Natural Gas	None - Operational practices are used to minimize emissions
DC2E Melter, cold fired - 40 MMBTU/hr – NOC #683 issued for modification	RM-M2E	Natural Gas	None - Operational practices are used to minimize emissions
DC2W Melter, cold fired - 40 MMBTU/hr – NOC #683 issued for modification	RM-M2W	Natural Gas	None - Operational practices are used to minimize emissions
DC3 Melter, cold fired - 40 MMBTU/hr – no NOC issued	RM-M3	Natural Gas	None - Operational practices are used to

Description	Kaiser ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
			minimize emissions
DC4 Melter, cold fired - 40 MMBTU/ht – no NOC issued	RM-M4	Natural Gas	None - Operational practices are used to minimize emissions
DC5 Melter, cold fired - 40 MMBTU/hr – no NOC issued	RM-M5	Natural Gas	None - Operational practices are used to minimize emissions
DC6 Melter, regenerative - 45 MMBTU/hr – NOC #1410	RM-M6	Natural Gas	–Regenerative burners and operational practices are used to minimize emissions
DC7 Melter, regenerative - 45 MMBTU/hr – NOC #1427	RM-M7	Natural Gas	Regenerative burners and operational practices are used to minimize emissions
DC8E Melter, cold fired - 40 MMBTU/hr – NOC #676 issued for modification	RM-M8E	Natural Gas	None - Operational practices are used to minimize emissions
DC8W Melter, cold fired - 40 MMBTU/hr – NOC #676 issued for modification	RM-M8W	Natural Gas	None - Operational practices are used to minimize emissions
DC1 through DC8 Holder Furnaces, each holder rated at 15 MMBTU/hr (NOC #676 – DC8 Holder) (NOC #683 – DC2 Holder)	RM-H1 through RM-H8 (holders) and RM-ILF (vented SNIF units; a.k.a. in-line fluxers)	Natural Gas	Dry Scrubbing Baghouse System RM(HBGHS)-1 – NOC #660 issued for baghouse system
Skim Cooler – NOC #239	RM-20	None	Baghouse
Induction Furnaces (2) – (NOC [unnumbered] 4/74)	RM-21	Electric	Baghouse (1 controlling both furnaces)
Secondary Aluminum Processing Unit (SAPU)	RM-SAPU, which includes RM-M1 through RM-8W and RM-21.  SAPU is split up as follows:  One SAPU: All cold-fired melters (RM-1, 2E, 2W, 3, 4, 5, 8E, and 8W)  One SAPU: Regenerative melters (RM-6 and RM-7)  One SAPU: Two induction	As noted above for each unit	As noted above for each unit

Description	Kaiser ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
	furnaces (RM-21)		

Table II.B-2 provides the applicable requirements for the emission units listed in Table II.B-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.B-2 – Remelt Area Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
70	SRCAA Order #91-01, Condition 2, 12/12/91  NOC #1410, Condition 13, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 13, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-M1 through RM-M8W and RM-H1 through RM-H8: At all times, including startup and shutdown, the melters and holders shall be maintained and operated in a manner consistent with good air pollution control practices.			5M
71	SRCAA Order #91-01, Condition 4 & 7, 12/12/91 <sup>1</sup>  NOC #1410, Condition 4, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 4, 4/28/08, as revised on 10/30/09 and 3/19/10	RM-M1 through RM-M8W and RM-H1 through RM-H8: The average opacity from any melter or holder shall not exceed 24% during any 60-minute period.  Note: The 8 holder furnace stacks are no longer directly vented. Order 96-05 addresses holder baghouse emission limits and the COM on its stack.	COMS or EPA Method 9	60-minute average	6M, 9M
72	SRCAA Order #91-01, Condition 5 & 7, 12/12/91 <sup>1</sup>  NOC #1410, Condition 4, 4/28/08, as revised on 10/30/09 and 3/19/10	RM-M1 through RM-M8W and RM-H1 through RM-H8: The average opacity from the melter and holder stacks shall not exceed 10% during more than 4% of the operating hours in a month. Compliance shall be determined by dividing the total number of operating hours in a month in which a melter or holder recorded an average opacity	COMS	60-minute average	6M, 9M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	NOC #1427, Condition 3, 4/28/08, as revised on 10/30/09 and 3/19/10	rate of greater than 10 percent by the aggregate number of operating hours in that month and multiplying this fraction by 100.  Note: The 8 holder furnace stacks are no longer directly vented. Order 96-05 addresses holder baghouse emission limits and the COM on its stack.			
73	SRCAA Order #91-01, Condition 6 & 7, 12/12/91 <sup>1</sup>  NOC #1410, Condition 4, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 4, 4/28/08, as revised on 10/30/09 and 3/19/10	RM-M1 through RM-M8W and RM-H1 through RM-H8: The average opacity from any melter or holder shall not exceed 40% during any 30 minute period.  Note: The 8 holder furnace stacks are no longer directly vented. Order 96-05 addresses holder baghouse emission limits and the COM on its stack.	EPA Method 9	30-minute average	6M, 7M, 9M
74	SRCAA Order #96-03, Condition 1, 4/24/96 as revised on 10/4/00	RM-M1 through RM-M8W: PM10 emissions from all melters combined shall not exceed 1200 pounds per day.	EPA reference methods found in 40 CFR Parts 51 and 60 (1995)	24-hour block	9M, 10M
75	NOC #1410, Condition 1, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 1, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-M6 and RM-M7: Emissions from the DC-6 or DC-7 melter furnaces shall not exceed the following limits, as determined by averaging the results from three test runs, each conducted over the furnace operating cycle when combustion occurs (period when burners are turned on, lid on, until metal charge has melted and "flat bath" conditions reached):  0.097 lb NOx / MMBTU 0.44 lb CO / MMBTU 0.044 gr/dscf PM			48M
76	NOC #1410, Condition 3, 4/28/08, as revised on 10/30/09 and	RM-M6 and RM-M7: Annual combined emissions from the DC-6 and DC-7 melter furnaces shall not exceed the following limits, based on a		12-month rolling total	9M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	3/19/10  NOC #1410, Condition 3, 4/28/08, as revised on 10/30/09 and 3/19/10	twelve month rolling total: PM: 15.48 tons/year PM10: 14.56 tons/year CO: 95.0 tons/year  Monthly and 12-month rolling total PM and PM10 emissions shall be calculated using the most recent SRCAA approved method. Monthly and 12-month rolling total CO emissions shall be calculated by multiplying the CO emission limit given in Condition 75 by the monthly gas usage for DC-6 and DC-7.			
77	NOC #1410, Condition 15, 4/28/08, as revised on 10/30/09 and 3/19/10	RM-M6: No more than 123,188 tons of charge shall be melted in the DC-6 melter furnace during any consecutive twelve month period.		12-month rolling total	50M
78	NOC #1427, Condition 15, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-M7: No more than 73,913 tons of charge shall be melted in the DC-7 melter furnace during any consecutive twelve month period.		12-month rolling total	50M
79	NOC #1410, Condition 16, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 16, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-M6 & RM-M7: No more than 237.5 million standard cubic feet (scf) of natural gas (equivalent to 249,134 MMBTU) shall be burned in the DC-6 or DC-7 melter furnace during any consecutive 12 month period.		12-month rolling total	51M
80	NOC #660, Condition 10, 9/27/95 as revised on 10/25/99 and 11/7/00— STATE/LOCAL ONLY  NOC #1410, Condition 5, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427,	RM-M1 through RM-M8W: No fluxing shall occur in melters which are not connected to the dry scrubbing baghouse system, except for small amounts of sodium scavenging additives. Provided that hydrogen chloride and chlorine emissions from use of such additives shall not exceed 0.05 pounds per ton of charge, quantities used shall be considered small. Prior to using any other fluxing agent except as allowed above, SRCAA shall be notified and, if required, a Notice of Construction			11M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	Condition 5, 4/28/08, as revised on 10/30/09 and 3/19/10	shall be filed with and approved by SRCAA.			
81	NOC #683, Condition 5, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01  NOC #676, Condition 5, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01	RM-M2E, RM-M2W, RM-H2, RM-M8E, RM-M8W, & RM-H8: Only natural gas shall be used as fuel.			No MRRR required
82	NOC #683, Condition 6, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01  NOC #676, Condition 6, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01	RM-H2 & RM-H8: HCl & Cl <sub>2</sub> emissions shall be controlled using the dry scrubbing baghouse system and in accordance with Condition 83. Only "Trona," or another SRCAA approved reagent may be used in the dry scrubbing baghouse system.			13M, 15M, 16M
83	NOC #683, Condition 7, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01  NOC #676, Condition 7, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01	Sufficient reagent availability shall be maintained in the dry scrubbing baghouse system to ensure a high level of HCl removal. The reagent availability ratio shall be maintained at greater than or equal to 1.1.			13M, 15M, 16M
84	NOC #683, Condition 8, 5/29/96 as revised on 10/25/99,	The reagent feed setting shall be maintained at or above the target reagent feed rate, TRF. By the end of the fifth business day of each month,			14M, 15M, 16M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	6/26/01, and 11/27/01  NOC #676, Condition 8, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01	the feed rate must be adjusted, if necessary, to meet this requirement.			
85	NOC #683, Condition 11, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01  NOC #676, Condition 11, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01  NOC #1410, Condition 12, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 12, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-M2E, M-M2W, RM-M8E & RM-M8W: PM emissions from the melters shall be controlled by: <ul style="list-style-type: none"> <li>• using mass balance burners;</li> <li>• no fluxing unless connected to dry scrubbing baghouse system except for small amounts of sodium scavenging additives. Provided that hydrogen chloride and chlorine emissions from use of such additives shall not exceed 0.05 pounds per ton of charge, quantities used shall be considered small;</li> <li>• prior to using any other fluxing agent except as allowed above, SRCAA shall be notified and, if required, a Notice of Construction shall be filed with and approved by SRCAA;</li> <li>• melting only acceptable charge per the remelt area O&amp;M plan; and</li> <li>• maintaining melters in proper operating condition.</li> </ul>			5M, 11M
86	NOC #683, Condition 13, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01  NOC #676, Condition 13, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01	RM-M2E, RM-M2W, RM-H2, RM-M6, RM-M7, RM-M8E, RM-M8W & RM-H8: A copy of NOC #683 and the approval letter, NOC #676 and the approval letter, NOC #1410 and the conditions of approval, and NOC #1427 and the conditions of approval shall be kept on file at the facility.			No MRRR required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	<p>NOC #1410, Condition 21, 4/28/08, as revised on 10/30/09 and 3/19/10</p> <p>NOC #1427, Condition 21, 7/18/08, as revised on 10/30/09 and 3/19/10</p>				
87	SRCAA Order #96-05, Condition 1, 4/24/96 as revised on 5/8/96 and 10/4/00	RM-H1 through RM-H8: PM10 emissions from the holders shall not exceed 83.0 pounds per day.	EPA reference methods found in 40 CFR Parts 51 and 60 (1995)	24-hour block average	5M, 6M, 8M, 9M,
88	SRCAA Order #96-05, Condition A, 4/24/96 as revised on 5/8/96 and 10/4/00	RM-H1 through RM-H8: Emissions from the holders shall be controlled using the dry scrubbing baghouse system.			5M, 6M, 12M
89	SRCAA Order #96-05, Condition B, 4/24/96 as revised on 5/8/96 and 10/4/00	RM-H1 through RM-H8: Except during periods of startup and shutdown, visible emissions from the dry scrubbing baghouse system shall not exceed 10% for any 3-minute average. During periods of startup and shutdown, visible emissions from the dry scrubbing baghouse system shall not exceed 20% for any 3-minute average.	EPA Method 9 (using 3-minute average instead of 6-minute average) or COM	3-minute average	5M, 6M
90	NOC #660, Condition 2, 9/27/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY	RM-H1 through RM-H8: Sodium bicarbonate or Trona <sup>3</sup> shall be used as reagent for acid gas removal in the dry scrubbing baghouse unless otherwise approved by SRCAA.			12M
91	NOC #660, Condition 4, 9/27/95 as revised on 10/25/99 and 11/7/00–	RM-H1 through RM-H8: Prior to using fluxes resulting in the release of air contaminants not previously emitted or that would cause increased emissions, SRCAA shall be notified and, if			No MRRR required

<sup>3</sup> SRCAA approved the use of Trona as a reagent in NOCs #676 & #683

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	STATE/LOCAL ONLY	required, a NOC shall be filed with and approved by SRCAA.			
92	NOC #660, Condition 5, 9/27/95 as revised on 10/25/99 and 11/7/00— STATE/LOCAL ONLY	RM-H1 through RM-H8: PM emissions from the baghouse shall not exceed 0.015 gr/dscf.	RM 5 including front and back half	Average of 3 1-hour tests	5M, 6M, 8M, 9M
93	NOC #660, Condition 8, 9/27/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY	RM-H1 through RM-H8: Visible emissions from the dry scrubbing baghouse system shall not exceed 20% (3-minute aggregate in any one hour).	State Method 9A or COM	3-minute aggregate (or 3-minute average by COM)	5M, 6M, 9M
94	NOC #660, Condition 9, 9/27/95 as revised on 10/25/99 and 11/7/00— STATE/LOCAL ONLY	RM-H1 through RM-H8: The by-pass stack shall only be used for breakdowns or contingencies approved by SRCAA. Anytime a by-pass occurs, the procedures in MRRR 17M shall be followed.			9M, 17M
95	SRCAA Order #96-06, Condition 1, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00	RM-21: PM10 emissions from the two induction furnaces combined shall not exceed 83.0 pounds per day.	EPA reference methods found in 40 CFR Parts 51 and 60 (1995)	24-hour block average	1M, 5M
96	SRCAA Order #96-06, Condition A, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00	RM-21: Visible emissions from the induction furnace baghouse shall not exceed 10%.	EPA Method 9 (using 3-minute average instead of 6-minute average)	3-minute average	1M, 5M
97	NOC #239, Condition 3, 11/15/89 as revised on 1/15/01 and 6/6/02	RM-20: PM emissions from the skim cooler shall not exceed 0.025 gr/dscf of exhaust gas			1M, 5M
98	NOC #239, Condition 4, 11/15/89 as revised on 1/15/01 and 6/6/02	RM-20: Visible emissions from the skim cooler shall not exceed 10%.			1M, 5M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
99	NOC #239, Condition 5, 11/15/89 as revised on 1/15/01 and 6/6/02	RM-20: In the event that the skim cooler cannot be used to process the skim, the skim shall be kept in the skim tub and covered with sodium chloride salt and left undisturbed for at least 24 hours, or until it can be cooled in the skim cooler.			5M
100	SRCAA Order #96-04, Condition 1, 4/24/96 as revised on 5/8/96	RM-20: PM10 emissions from the skim cooler shall not exceed 50.0 pounds per day.			1M, 5M
101	40 CFR § 63.4(b), 2002 WAC 173-400-075(5), 5/8/07	RM-SAPU: The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard under 40 CFR Part 63.			No MRRR required
102	40 CFR § 63.6(e)(1), 4/20/06 WAC 173-400-075(5), 5/8/07	RM-SAPU: At all times, including periods of startup, shutdown, and malfunction, units and associated air pollution control equipment shall be operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required in 40 CFR Part 63, Subpart RRR. Malfunctions shall be corrected as soon as practicable in accordance with the startup, shutdown, and malfunction plan (see Condition 33M).			28M, 33M, 34M, 35M, 36M
103	40 CFR §63.6(f), 4/20/06 40 CFR §63.6(h), 4/20/06 40 CFR § 63.1501(a), 9/24/02 WAC 173-400-075(5), 5/8/07	Conditions 104 through 110 apply at all times, except during periods of startup, shutdown, or malfunction, or as otherwise specified in 40 CFR Part 63, Subpart RRR.			No MRRR required
104	NOC #1410, Condition 2, 4/28/08, as revised on 10/30/09 NOC #1427,	RM-M6 & RM-M7: Except as noted in Condition 103, Dioxin / Furan (D/F) emissions from the DC-6 and DC-7 furnace exhausts shall not exceed 15 ug of D/F TEQ per Mg (2.1 x 10 <sup>-4</sup> gr of D/F TEQ per ton) of feed / charge,			28M, 49M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	Condition 2, 7/18/08, as revised on 10/30/09 and 3/19/10	averaged over the melter furnace operating cycle (period between initial charging and transfer of aluminum to holder furnace).			
105	40 CFR §63.1505(i)(3), (k)(3), (k)(5), & (k)(6), 10/3/05  WAC 173-400-075(5), 5/8/07	RM-SAPU: Except as noted in Condition 103, the 3-day, 24-hour rolling average Dioxin / Furan (D/F) emissions shall not exceed the D/F emission limit for secondary aluminum processing units, as calculated using Equation 3 in 40 CFR §63.1505(k)(3). With the prior approval of SRCAA, the permittee may redesignate any existing group 1 furnace as a new emission unit. Any emission unit so redesignated may thereafter be included in the new SAPU at that facility. Any such redesignation will be solely for the purpose of the MACT standard and will be irreversible.			28M, 30M, 31M, 32M, 36M
106	40 CFR §63.1506(a)&(b), 9/3/04  WAC 173-400-075(5), 5/8/07  NOC #1410, Condition 14, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 14, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-SAPU: Except as noted in Condition 103, each emission unit in a SAPU must be labeled, including identification of the type of emission unit and the applicable operational standards and control standards.			28M, 29M, 36M
107	40 CFR §63.1506(a)&(d), 9/3/04  WAC 173-400-075(5), 5/8/07  NOC #1410, Condition 10, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427,	RM-SAPU: Except as noted in Condition 103, feed/charge shall be measured in accordance with 40 CFR §63.1506(d).			28M, 30M, 36M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	Condition 10, 7/18/08, as revised on 10/30/09 and 3/19/10				
108	40 CFR §63.1506(a), (m)(5), & (n)(1), 9/3/04  WAC 173-400-075(5), 5/8/07  NOC #1410, Condition 11, 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 11, 7/18/08, as revised on 10/30/09 and 3/19/10	RM-SAPU: Except as noted in Condition 103, each emission unit shall be operated with a total reactive flux injection rate (sodium scavenging additives only) at or below the level established during the performance test.			28M, 31M, 36M
109	40 CFR §63.1506(a), (n)(2) & (p), 9/3/04  WAC 173-400-075(5), 5/8/07  NOC #1410, Condition 13.b., 4/28/08, as revised on 10/30/09 and 3/19/10  NOC #1427, Condition 13.b., 7/18/08, as revised on 10/30/09 and 3/19/10	RM-SAPU: Except as noted in Condition 103, each group 1 furnace without add-on air pollution control devices must be operated in accordance with the measures documented in the MACT OM&M plan and within the parameter values or ranges established in the MACT OM&M plan.			28M, 30M, 31M, 36M
110	40 CFR §63.1506(a) & (p), 9/3/04  WAC 173-400-075(5), 5/8/07  NOC #1410, Condition 13.b., 4/28/08, as revised on 10/30/09 and	RM-SAPU: When a process parameter or control device operating parameter deviates from the value or range established in the MACT OM&M plan, corrective action must be taken in accordance with 40 CFR §63.1506(p).			28M, 33M, 34M, 35M, 36M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	3/19/10  NOC #1427, Condition 13.b., 7/18/08, as revised on 10/30/09 and 3/19/10				

### C. HOT ROLLING MILL AREA EMISSION LIMITATIONS

This section of the permit covers the Hot Rolling Mill Area and associated activities. The units covered are listed in Table II.C-1.

Table II.C-1 – Hot Rolling Mill Area

Description	Kaiser ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
80" Hot Rolling Mill – NOC #86	HL-1	None	Inertial Separators (2)
112" Hot Rolling Mill	HL-2	None	None
132" Hot Rolling Mill	HL-3	None	None
Pusher Furnace – NOC #674	HL-4	Natural Gas	None
Ingot Soaking Pits (39-41) – NOC #443	HL-5	Natural Gas	None
Number 4 Scalper – NOC #188	HL-6	None	Wet Cyclone

Table II.C-2 provides the applicable requirements for the units listed in Table II.C-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.C-2 – Hot Rolling Mill Area Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
111	NOC #188, Condition 3, 3/4/88 as revised on 4/8/88 and 1/18/01	HL-6: PM emissions from the #4 scalper shall not exceed 0.01 gr/dscf	RM 5	Average of 3 1-hour tests	47M
112	NOC #188, Condition 4, 3/4/88 as revised on 4/8/88 and 1/18/01	HL-6: The #4 scalper shall be operated such that: <ul style="list-style-type: none"> <li>scalping may not occur unless the scrubber fan and pump are running; and</li> <li>if the scrubber pump or fan stops during ingot scalping, scalping will stop also.</li> </ul>			18M
113	NOC #443, Condition 4, 7/21/93	HL-5: Ingot soaking pits (39-41) PLCs and burners must be maintained in good operating condition.			19M
114	NOC #443, Condition 6, 7/21/93	HL-5: Before any fuel other than natural gas is used in the ingot soaking pits (39-41), approval must be obtained from SRCAA.			No MRRR required
115	NOC #443, Condition 7, 7/21/93	HL-5: NOx emissions from the ingot soaking pits (39-41) heater shall not exceed 0.1 pounds per million BTU when firing natural gas.			19M
116	NOC #443, Condition 8, 7/21/93	HL-5: A copy of NOC #443 and the approval letter shall be kept on file at the facility.			No MRRR required
117	NOC #674, Condition 1, 12/18/95	HL-4: The pusher furnace's burners and associated equipment shall be maintained in good operating condition.			20M
118	NOC #674, Condition 3, 12/18/95	HL-4: Only natural gas shall be used to fuel the pusher furnace.			No MRRR required
119	NOC #674, Condition 4, 12/18/95	HL-4: NOx emissions from the pusher furnace shall not exceed 0.14 pounds per million BTU (one hour average).			20M
120	NOC #674, Condition 5, 12/18/95	HL-4: Carbon monoxide emissions from the pusher furnace shall not exceed 0.035 pounds per million BTU (one hour average).			20M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
121	NOC #674, Condition 7, 12/18/95	HL-4: Annual natural gas usage in the pusher furnace shall not exceed 201.6 million cubic feet. Alternately SRCAA may base the maximum allowable use of the furnace on pounds of aluminum processed if KAFP submits sufficient documentation to set such a level.			21M
122	NOC #674, Condition 8, 12/18/95	HL-4: A copy of NOC #674 and the approval letter shall be kept on file at the facility.			No MRRR required
123	NOC #86, Opening paragraph, 6/22/84	HL-1: Visible emissions from the 80" Mill shall be no more than 10%.	State Method 9A	3-minute aggregate	22M
124	NOC #86, Condition 1, 6/22/84	HL-1: PM emissions from the 80" Mill shall not exceed 0.04 gr/dscf.	RM5 (front and back half)	3 1-hour tests	22M

**D. ANNEALING FURNACE EMISSION LIMITATIONS**

This section of the permit covers the annealing furnaces at the site. The units covered are listed in Table II.D-1.

Table II.D-1 – Annealing Area

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
Inert Annealing Furnaces (Nos. 19 through 22 & 25 through 32) – NOC #69	CM-1	Electrostatic Precipitators

Table II.D-2 provides the applicable requirements for the emission units listed in Table II.D-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.D-2 – Annealing Furnace Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
125	NOC 69, Condition 1, 3/16/84 as revised on 2/26/96	CM-1: Kaiser shall follow the most recently approved Inert Annealing Furnaces O&M plan for the electrostatic precipitator(s). Changes to the plan shall be approved by SRCAA prior to implementation.			23M

### E. BOILERS EMISSION LIMITATIONS

This section of the permit covers the boilers at the site. The units covered are listed in Table II.E-1.

Table II.E-1 - Boilers

Description	Kaiser ID Number Used in Permit Application	Fuels Used
Boiler #1 (40,000 pounds of steam per hour = 60 MMBtu/hr)	UT-1	Natural Gas, Diesel, & Used Oil
Boiler #2 (40,000 pounds of steam per hour = 60 MMBtu/hr)	UT-2	Natural Gas, Diesel, & Used Oil
Boiler #3 (40,000 pounds of steam per hour = 60 MMBtu/hr)	UT-3	Natural Gas, Diesel, & Used Oil

Table II.E-2 provides the applicable requirements for the boilers listed in Table II.E-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.E-2 - Boilers Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
126	WAC 173-400-050(1) & WAC 173-400-050(3), 1/10/05  NOTE: The exception in WAC	Boilers #1 - #3: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf corrected to 7% oxygen.	RM 5 (1995) or procedures in WAC 173-400-050 approved per Condition 46-Source Testing	average of three one-hour tests	24M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	173-400-050(3) is STATE/LOCAL ONLY				
127	RCW 70.94.610, 1999 – STATE/LOCAL ONLY	Boilers #1 - #3: Used oil burned in the boilers must meet the following specifications: <ul style="list-style-type: none"> <li>• 2 ppm maximum cadmium</li> <li>• 10 ppm maximum chromium</li> <li>• 100 ppm maximum lead</li> <li>• 5 ppm maximum arsenic</li> <li>• 1000 ppm maximum total halogens</li> <li>• 2 ppm maximum polychlorinated biphenyls (PCBs)</li> <li>• 0.1% maximum ash</li> <li>• 1.0% maximum sulfur</li> <li>• 100°F minimum flash point.</li> </ul>	EPA Method AES 0029 (metals)  EPA Method 9076 (Halogen)  EPA Method 8080 (PCBs)  ASTM Method D-482 (Ash)  ASTM Method D-3120 (Sulfur)  Pensky-Martens Closed Cup Tester using ASTM Method D-93-79 or D-93-80; or Setaflash Closed Cup Tester using ASTM Method D-3278-78 (Flash Point)		25M

**F. WASTEWATER TREATMENT EMISSION LIMITATIONS**

This section of the permit covers wastewater treatment occurring at the site. The units covered are listed in Table II.F-1.

Table II.F-1 – Wastewater Treatment

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
Wastewater Treatment Plant	WW-1	Scrubber approved under NOC #681 and scrubber approved under NOC #881

Table II.F-2 provides the applicable requirements for the units listed in Table II.F-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.F-2 – Wastewater Treatment Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
128	NOC #681, Condition 1, 2/28/96 – STATE/LOCAL ONLY	WW-1: The WWT scrubber approved under NOC #681 shall be maintained in proper working condition and operated whenever emissions from the wastewater treatment plant could occur.			26M
129	NOC #681, Condition 4, 2/28/96 – STATE/LOCAL ONLY	WW-1: The liquid scrubbing medium supplied to the WWT scrubber approved under NOC #681 shall be clean sanitary water.			No MRRR required
130	NOC #681, Condition 6, 2/28/96 – STATE/LOCAL ONLY	WW-1: A copy of NOC #681 and the approval letter shall be kept on file at the facility.			No MRRR required
131	NOC #881, Condition 2, 5/8/98 – STATE/LOCAL ONLY	WW-1: The scrubber shall be maintained in proper working condition and operated whenever emissions from the wastewater treatment plant could occur.			26M
132	NOC #881, Condition 3, 5/8/98 – STATE/LOCAL ONLY	WW-1: The pH setpoint for the scrubber shall be maintained at 7.5 or higher and the average daily pH of the scrubbing medium shall not fall below 7.5 (24-hour block average) when the scrubber is operating. SRCAA may approve an alternate pH limit, using the criteria specified in Condition 3 of the approval for NOC #881.			27M
133	NOC #881, Condition 6, 5/8/98 – STATE/LOCAL ONLY	WW-1: The liquid scrubbing medium for the WWT scrubber shall be water with sodium hydroxide and sodium hypochlorite added to enhance pH and emissions control.			No MRRR required
134	NOC #881, Condition 8, 5/8/98 – STATE/LOCAL ONLY	WW-1: Prior to connecting additional processes to the WWT scrubber, SRCAA shall be consulted to determine if a NOC is required. If required, a NOC shall be submitted to and approved by SRCAA prior to the connection.			No MRRR required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
135	NOC #881, Condition 9, 5/8/98 – STATE/LOCAL ONLY	WW-1: A copy of NOC #881 and the approval letter shall be kept on file at the facility.			No MRRR required

**G. HEAT TREAT OVENS EMISSION LIMITATIONS**

This section of the permit covers the natural gas fired heat treat ovens at the facility. The units covered are listed in Table II.G-1.

Table II.G-1 – Heat Treat Ovens

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
Otto Junker Natural Gas Fired 2-Plate Horizontal Heat Treat Oven with 12 Recuperative Burners (total heat input = 6.55 MMBtu/hr) – NOC #1322	HHT-1	None
Otto Junker Natural Gas Fired 4-Plate Horizontal Heat Treat Oven with 48 Recuperative Burners (total heat input = 26.2 MMBtu/hr) – NOC #1334	HHT-2	None
Otto Junker Natural Gas Fired 4-Plate Horizontal Heat Treat Oven with 24 Recuperative Burners (total heat input = 13.1 MMBtu/hr) – NOC #1366	HHT-3	None
Cummins 1000DFHD Diesel Back-up Generator Set (1490 bhp) – NOC #1335	HHT-4	None

Table II.G-2 provides the applicable requirements for the units listed in Table II.G-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.G-2 – Heat Treat Ovens Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
136	<p>NOC #1322, Condition 1, 2/8/06, as revised on 10/30/09</p> <p>NOC #1334, Condition 1, 2/21/06 as revised on 11/16/07 and 10/30/09</p> <p>NOC #1335, Condition 3, 2/21/06</p> <p>NOC #1366, Condition 1, 10/27/06, as revised on 10/30/09</p>	<p>A copy of the NOCs #1322, #1334, #1335, and #1336 applications and orders of approval shall be kept on-site and made available to SRCAA personnel upon request.</p>			No MRRR Required
137	<p>NOC #1322, Condition 2, 2/8/06, as revised on 10/30/09</p> <p>NOC #1334, Condition 2, 2/21/06 as revised on 11/16/07 and 10/30/09</p> <p>NOC #1366, Condition 2, 10/27/06, as revised on 10/30/09</p>	<p>HHT-1, HHT-2, &amp; HHT-3: The heat treat ovens shall be maintained in good operating condition.</p>			40M
138	<p>NOC #1322, Condition 3, 2/8/06, as revised on 10/30/09</p> <p>NOC #1334, Condition 3, 2/21/06 as revised on 11/16/07 and</p>	<p>HHT-1, HHT-2, &amp; HHT-3: At high fire, NOx emissions from each oven shall not exceed 192 ppmv @ 3% O2</p>			41M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	10/30/09 NOC #1366, Condition 3, 10/27/06, as revised on 10/30/09				
139	NOC #1322, Condition 3, 2/8/06, as revised on 10/30/09 NOC #1334, Condition 3, 2/21/06 as revised on 11/16/07 and 10/30/09 NOC #1366, Condition 3, 10/27/06, as revised on 10/30/09	HHT-1, HHT-2, & HHT-3: At high fire, CO emissions from each oven shall not exceed 50 ppmv @ 3% O <sub>2</sub>			41M
140	NOC #1322, Condition 4, 2/8/06, as revised on 10/30/09 NOC #1334, Condition 4, 2/21/06 as revised on 11/16/07 and 10/30/09 NOC #1366, Condition 4, 10/27/06, as revised on 10/30/09	HHT-1, HHT-2, & HHT-3: Each heat treat oven exhaust stack shall have a minimum height of 50 feet above ground level and shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of exhaust shall be installed at the end of the stack.			No MRRR Required
141	NOC #1322, Condition 5, 2/8/06, as revised on 10/30/09 NOC #1334, Condition 5, 2/21/06 as revised on 11/16/07 and	HHT-1, HHT-2, & HHT-3: Visible emissions from each heat treat oven exhaust stack shall not exceed 10%.	EPA Reference Method 9	6-minute average	1M, 40M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	10/30/09 NOC #1366, Condition 5, 10/27/06, as revised on 10/30/09				
142	NOC #1322, Condition 6, 2/8/06, as revised on 10/30/09  NOC #1334, Condition 6, 2/21/06 as revised on 11/16/07 and 10/30/09  NOC #1366, Condition 6, 10/27/06, as revised on 10/30/09	HHT-1, HHT-2, & HHT-3: SRCAA approval must be obtained before any fuel other than natural gas is burned in any heat treat oven.			No MRRR Required
143	NOC #1322, Condition 7, 2/8/06, as revised on 10/30/09	HHT-1: No more than 29.4 million standard cubic feet (scf) of natural gas (equivalent to 30,000 MMBtu) shall be burned in HHT-1 during any consecutive 12 month period.			42M
144	NOC #1334, Condition 7, 2/21/06 as revised on 11/16/07 and 10/30/09	HHT-2: No more than 127.5 million standard cubic feet (scf) of natural gas (equivalent to 130,000 MMBtu) shall be burned in HHT-2 during any consecutive 12 month period.			42M
145	NOC #1366, Condition 7, 2/21/06, as revised on 10/30/09	HHT-3: No more than 58.8 million standard cubic feet (scf) of natural gas (equivalent to 60,000 MMBtu) shall be burned in HHT-3 during any consecutive 12 month period.			42M
146	NOC #1335, Condition 4, 2/21/06	HHT-4: The emergency generator set associated with the heat treat ovens shall be maintained in good operating condition			43M
147	NOC #1335, Condition 5, 2/21/06	HHT-4: The emergency generator diesel engine's exhaust stack shall each have a minimum			No MRRR Required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		height of 12 feet above ground level and shall exhaust vertically. There shall be no flow obstructions (elbows, tees, caps, etc...) at the top of the stack which impede the vertical flow of the exhaust			
148	NOC #1335, Condition 6, 2/21/06	HHT-4: Only fuel oil #2 (diesel) with a sulfur content of 0.05% (by weight) or less shall be used to fuel the emergency generator , unless approval is obtained from SRCAA to use an alternate fuel.			44M
149	NOC #1335, Condition 7, 2/21/06	HHT-4: The emergency generator / diesel engine shall not be operated more than 929.3 hours in any consecutive twelve-month period.			45M
150	NOC #1335, Condition 8, 2/21/06	HHT-4: Visible emissions from the emergency generator diesel engine exhaust stack shall not exceed 10%.	EPA Reference Method 9	6-minute average	1M, 43M
151	NOC #1335, Condition 9, 2/21/06	HHT-4: Particulate emissions from the emergency generator diesel engine shall not exceed 0.01 grains per dry standard cubic foot of exhaust stack flow. Testing for this limit may be required by SRCAA at any time, including, but not limited to, occasions when the opacity limit, specified in Condition 151, is exceeded.	EPA RM 5 and 202	average of three one-hour tests	1M, 43M

## H. GASOLINE DISPENSING FACILITY EMISSION LIMITATIONS

This section of the permit covers the gasoline dispensing facility at the facility. The units covered are listed in Table II.H-1.

Table II.H-1 – Gasoline Dispensing Facility

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
Gasoline Dispensing Facility – 10,000 gallon above ground	N/A – not listed in permit application	None

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
gasoline storage tank		

Table II.H-2 provides the applicable requirements for the units listed in Table II.H-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.H-2 – Gasoline Dispensing Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
152	40 CFR §63.11116(a), 1/10/08	<p>On and after January 10, 2011, Kaiser shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. Minimize gasoline spills;</li> <li>b. Clean up spills as expeditiously as practicable;</li> <li>c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and</li> <li>d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.</li> </ul>			52M

## I. ALUTEK

This section of the permit covers the emission units at Alutek, located at 3401 N. Tschirley, Spokane, WA. Alutek is considered a "support facility" to Kaiser and therefore is part of the major facility covered under this Air Operating Permit. The units covered are listed in Table II.I-1.

Table II.I-1 – Alutek Emission Units

Description	Kaiser ID Number Used in Permit Application	Air Pollution Control Equipment
Plate Sander – NOC #1316	AL-1	Pneumafil PCFH-28 Dust Collector (8,000 cfm)

Table II.I-2 provides the applicable requirements for the units listed in Table II.I-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.I-2 – Alutek Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
153	NOC #1316, Condition 3, 11/7/05	AL-1: A copy of the NOC #1316 application and order of approval shall be kept on-site and made available to SRCAA personnel upon request.			No MRRR Required
154	NOC #1316, Condition 4, 11/7/05	AL-1: The dust collector associated with the plate sander shall be maintained in good operating condition			46M
155	NOC #1316, Condition 5, 11/7/05	AL-1: Particulate matter spilled or deposited in the load-out area of the dust collector associated with the plate sander at Alutek shall be immediately removed. The deposition of particulate matter onto the property of others or beyond the property line is prohibited.			3M
156	NOC #1316, Condition 6, 11/7/05	AL-1: Visible emissions from the dust collector associated with the plate sander at Alutek shall not exceed 5%	EPA Reference Method 9	6-minute average	1M, 46M
157	NOC #1316, Condition 7, 11/7/05	AL-1: Particulate emissions from the dust collector exhaust associated with the plate sander at Alutek (including noncondensable particulate) shall not exceed 0.01 grains per dry standard cubic foot of exhaust stack flow. Testing for this limit may be required by SRCAA at any time, including, but not limited to, occasions when the opacity limit, specified in Condition	EPA RM 5 and 202	average of three one-hour tests	1M, 46M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		156, is exceeded.			
158	NOC #1316, Condition 8, 11/7/05	AL-1: The Alutek dust collector stack shall have a minimum height of 30 feet above the ground and shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of exhaust shall be installed at the end of the stack.			No MRRR Required
159	NOC #1316, Condition 10, 11/7/05	AL-1: Damaged and/or used filters and/or cartridges from the dust collector associated with the plate sander at Alutek must be disposed of in a manner that will not contribute to an increase of particulate emissions (i.e., fugitive emissions)			46M
160	NOC #1316, Condition 11, 11/7/05	AL-1: SRCAA shall be notified of any applicable upset conditions, breakdowns, or failures associated with the dust collectors or bin loading system at Alutek. The notification shall occur within 24 hours of the occurrence and in accordance with WAC 173-400-107 and SRCAA Regulation I, Section 6.08.			No MRRR Required

## J. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

**1M.** The permittee shall meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

a) The permittee shall perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from the following emission points:

- 80" Hot Mill Inertial Separator Stack, HL-1;
- Pusher Furnace, HL-4;
- Ingot Soaking Pits #39 through 42, HL-5;
- Inert Annealing Furnaces (19-22 and 25-32) Electrostatic Precipitator(s), CM-1;
- Skim Cooler Baghouse, RM-20;
- Induction Furnaces Baghouse; RM-21;

- Boilers #1, #2, & #3, UT-1, UT-2, & UT-3;
- Heat Treat Ovens, HHT-1, HHT-2, & HHT-3;
- Emergency generator / Diesel Engine, HHT-4; and
- Dust Collector associated with the plate sander at Alutek, AL-1.

The weekly inspections shall be conducted as follows:

- 1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
- 2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
- 3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
- 4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

- b) If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:
  - 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
  - 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
  - 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2), and/or, b) 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance

Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1) and, if a particulate matter standard applies, testing according to c) 2).

- 1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 1993) or Ecology Method 9A (July 12, 1990), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 1 working day after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.
- 2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall perform, or have performed, RM 5 (July 1, 1993) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

**2M.** The permittee is permitted to perform soot blowing and grate cleaning necessary to the operation of boiler facilities. As such, this practice, except for testing and trouble shooting, is to be scheduled for the same approximate times each day that soot blowing and grate cleaning occurs. SRCAA shall be advised of this schedule in writing. [WAC 173-400-040(1), 1/10/05 (8/20/93)] [SRCAA Regulation I, 6.02, 3/4/04 – STATE / LOCAL ONLY}

**3M.** The permittee shall meet the requirements given in a) and b), and if triggered, the permittee shall meet the requirements given in c).

a) The permittee shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the “MRRR Reference” column in the above tables is being met. For permit conditions that

require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 3M.d) below. Records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

- b) The permittee shall record and investigate complaints received regarding air quality problems. Complaints shall be investigated as soon as possible, but no later than 8 hours of receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 3M.d) below. Records shall be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. Records shall be kept in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- c) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if the problem is solved as soon as possible, but no later than 24 hours of first observing the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations. Records shall be kept of all correction action(s) taken by the permittee. Records shall be kept in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- d) The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.
  - i. Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:
    - A. Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness;
    - B. Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air;
    - C. Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials;

- D. Minimizing the free fall distance, i.e., drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc...
  - E. Maintaining adequate freeboard and/or covering loads when transporting PM containing material;
  - F. Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc... and/or using tarps, chemical dust suppressants, vegetation, etc.. to minimize releases to air;
  - G. Keeping paved surfaces clean to minimize re-entrainment of PM into the ambient air; and/or
  - H. Limit vehicle speed to less than 15 miles per hour on unpaved areas.
- ii. Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:
- A. Paving unpaved traveled surfaces;
  - B. Gravelling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness;
  - C. Paving or installing quarry spalls<sup>4</sup> at exit aprons;
  - D. Cleaning vehicle tires and undercarriages before exiting to paved public roadways; and/or
  - E. Promptly cleaning material that has been tracked out onto paved public roadways.
- iii. Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:
- A. Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials;
  - B. Using solvent containing materials with lower vapor pressures;
  - C. Keeping unused or partially used containers of organic solvent containing materials closed, except when in use;
  - D. Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers; and/or
  - E. Keeping all disposable materials which contain organic solvents in closed containers.

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<sup>4</sup> A quarry spall, aka rock entrance, is a buffer area consisting of very large aggregate, usually 4 to 8 inch crushed rock, which jars material free from tires and undercarriages.

- iv. Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:
- A. Keeping odorous materials in closed containers or confined within a building;
  - B. Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses;
  - C. Using scrubbers or other add-on control equipment to control odors;
  - D. Using materials which release less odorous compounds;
  - E. Disposing of odorous, or potentially odorous, materials promptly; and/or
  - F. Operating and maintaining equipment and processes in a manner that minimizes odors.

[WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

**4M.** Unless otherwise expressly allowed or prohibited in this permit, the permittee shall certify whether only natural gas, propane (LPG), gasoline, fuel oil #2, and used oil were used as fuel in all fuel fired equipment during the reporting period. [WAC 173-401-615(1) & (2), 9/16/02]

**5M.** The permittee shall follow the operation and maintenance plan for the remelt area, dated April 22, 2010, or a SRCAA approved revision. The plan shall be updated at least every two years and submitted to SRCAA for review and approval.

a. At a minimum, the plan shall address the following:

- i. for all melters and holders, procedures for startup and upset conditions (including failure of opacity monitors) [SRCAA Order #91-01, Condition 1, 12/12/91];
- ii. for all melters and holders, timely access for SRCAA compliance personnel [SRCAA Order #91-01, Condition 1, 12/12/91];
- iii. for all melters and holders, segregation of scrap material [SRCAA Order #91-01, Condition 1, 12/12/91];
- iv. for all melters and holders, procedures for calculation of Operating Hours [SRCAA Order #91-01, Condition 1, 12/12/91];
- v. procedures for molten metal charging by truck and for skimming as detailed in Appendices C & D of the January 16, 1996 CONSENT DECREE AND FINAL JUDGMENT BETWEEN THE UNITED STATE AND KAISER ALUMINUM & CHEMICAL CORPORATION or as otherwise approved by SRCAA; [NOC #683, Condition 3, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 3, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01];
- vi. for the melters and holders of DC2 and DC8, RM(M)-2E, RM(M)-2W, RM(H)-2, RM(M)-8E, RM(M)-8W, RM(H)-8, routine maintenance activities required to keep the melters and holders in proper operating condition with regard to minimizing emissions, including manufacturer recommended operation and maintenance procedures for the burners [NOC #683, Condition 3, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 3, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01];
- vii. for the melters and holders of DC2 and DC8, RM(M)-2E, RM(M)-2W, RM(H)-2, RM(M)-

- 8E, RM(M)-8W, RM(H)-8, a description of recordkeeping activities including those records being kept, method(s) of recordkeeping, and length of time that records are kept [NOC #683, Condition 3, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 3, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01];
- viii. for the holder dry scrubbing/baghouse system, routine maintenance activities required to keep the control system in proper operating condition, including manufacturer recommended operation and maintenance procedures [NOC #660, Condition 11, 9/29/95 as revised on 10/25/99 and 11/7/00– STATE/LOCAL ONLY] [SRCAA Order #96-05, Condition D, 4/24/96 as revised on 5/8/96 and 10/4/00];
  - ix. for the holder dry scrubbing/baghouse system, a quality assurance/quality control plan for the continuous opacity monitor system [NOC #660, Condition 11, 9/29/95 as revised on 10/25/99 and 11/7/00– STATE/LOCAL ONLY];
  - x. for the holder dry scrubbing baghouse system, a description of recordkeeping activities including those records being kept, method(s) of recordkeeping, and length of time that records are kept [NOC #660, Condition 11, 9/29/95 as revised on 10/25/99 and 11/7/00– STATE/LOCAL ONLY] [SRCAA Order #96-05, Condition D, 4/24/96 as revised on 5/8/96 and 10/4/00] ;
  - xi. for the induction furnace baghouse, routine maintenance activities, required to keep the control system in proper operating condition, including manufacturer recommended operation and maintenance procedures [SRCAA Order #96-06, Condition C, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00];
  - xii. for the induction furnace baghouse, a description of recordkeeping activities, including those records being kept, method(s) of recordkeeping, and length of time that records are kept [SRCAA Order #96-06, Condition C, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00];
  - xiii. for the skim cooler baghouse, routine maintenance activities, required to keep the control system in proper operating condition, including manufacturer recommended operation and maintenance procedures [SRCAA Order #96-04, Condition B, 4/24/96 as revised on 5/8/96];
  - xiv. for the skim cooler, procedures for cooling skim during skim cooler breakdown, fabric filtration system breakdown, and/or maintenance; [NOC #239, 11/15/89, as revised on 1/5/01 and 6/6/02]; and
  - xv. for the skim cooler baghouse, a description of recordkeeping activities, including those records being kept, method(s) of recordkeeping, and length of time that records are kept [SRCAA Order #96-04, Condition B, 4/24/96 as revised on 5/8/96]
- b. Maintenance records shall be kept for equipment necessary for minimizing or otherwise reducing emissions from the melters, holders, induction furnace baghouse, and skim cooler baghouse. Compliance with this requirement may be achieved by implementing a computerized preventative maintenance system that regularly schedules and tracks maintenance activities. [NOC #683, Condition 12, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 12, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01] [NOC #660, Condition 11, 9/29/95 as revised on 10/25/99 and 11/7/00– STATE/LOCAL ONLY] [SRCAA Order #96-05, Condition D, 4/24/96 as revised on 5/8/96 and 10/4/00] [SRCAA Order #96-06, Condition D, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00] [SRCAA Order #96-04, Condition C, 4/24/96 as revised on 5/8/96] [NOC #1410, Condition 13, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, 7/18/08, as revised on 10/30/09 and 3/19/10]; and

c. Required records shall be kept for a minimum of five years, and include information required in Condition 24- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #683, Condition 12, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 12, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01] [NOC #660, Condition 11 & 12, 9/29/95 as revised on 10/25/99 and 11/7/00– STATE/LOCAL ONLY] [SRCAA Order #96-05, Condition D & E, 4/24/96 as revised on 5/8/96 and 10/4/00] [SRCAA Order #96-06, Condition C & D, 4/24/96 as revised on 5/8/96, 10/4/00, and 10/19/00] [SRCAA Order #96-04, Condition B & C, 4/24/96 as revised on 5/8/96] [NOC #1410, Condition 13, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, 7/18/08, as revised on 10/30/09 and 3/19/10].

**6M.** Except as provided in Condition 23 – Monitoring System Malfunctions, the permittee shall install and operate continuous opacity monitors (COMs) and data processing and recording equipment meeting the requirements of 40 CFR 60.13 and 40 CFR 60, Appendix B on each melter furnace stack and the holder baghouse stack.

- a. Each COM shall meet the requirements of EPA Performance Specification 1, 40 CFR Part 60, Appendix B (1998). The COMs shall be audited at least once every quarter and maintain a calibration error of 3% or less, per 40 CFR 60, Appendix B, Performance Specification 1 (1998). The permittee shall notify SRCAA via e-mail or telephone at least one day prior to each quarterly audit when any of the COMs will be off-line (i.e., in “maintenance mode”). Results of the quarterly COM audits shall be kept for 5 years and made available to SRCAA upon request.
- b. The permittee shall implement the quality assurance plan (QAP) for the COMs most recently approved by SRCAA.
- c. The opacity monitors shall be operated in accordance with 40 CFR §60.13 (1995), including the operation requirements in 40 CFR §60.13(e), except that for the holder dry scrubbing system baghouse opacity monitor, one cycle of data recording shall be a three minute average and each three minute average shall be calculated from 18 or more datapoints, equally spaced over each three minute period. Daily checks shall be performed on the COMs in accordance with 40 CFR §60.13.

[SRCAA Order #91-01, Condition 3, 7, & 11, 12/12/91] [SRCAA Order #96-05, Condition B, 4/24/96 as revised on 5/8/96 and 10/4/00] [NOC #1410, Condition 8, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 8, 7/18/08, as revised on 10/30/09 and 3/19/10]

**7M.** The permittee shall implement the most recent SRCAA approved method to determine 30-minute opacity averages that exceed 40%, using the continuous opacity monitoring system. Changes to the method must be approved by SRCAA prior to implementation. Examples of acceptable methods include:

- a. Reviewing each operating hour when the hourly average opacity is greater than or equal to

20% to determine whether the 40% opacity limit given in Condition 73 was met during each 30-minute interval. Records of all 30-minute average opacity values must be kept for each operating hour that is reviewed; or

- b. Re-programming the data acquisition system to include 30-minute averages.

The data recovery provisions of Condition 22 – Data Recovery apply to this condition.

[WAC 173-401-615(1), (2), & (3), 9/16/02] [NOC #1410, Condition 9, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 9, 7/18/08, as revised on 10/30/09 and 3/19/10]

**8M.** If the opacity from the holder baghouse exceeds 5%, as measured by the COM, based on a three-minute average, the permittee shall take the following actions:

- a. As a means of demonstrating compliance, verify and certify that:

- i. the PM emissions are not the result of equipment malfunction and the equipment, if any, causing the emissions is performing its normal, designed function; and
- ii. the holder baghouse is being operated properly in accordance with the O&M plan described in Condition 5M.

If a.i. and/or a.ii. are not being met, corrective action must be taken within 1 hour of any 3-minute average reading of 5 percent or more opacity. After corrective action is taken, if required, and if a.i. and a.ii. are being met but visible emissions above 5% (based on a three-minute average) are still observed, the permittee must source test according to b. below to demonstrate compliance.

- b. As a means of demonstrating compliance with the PM or grain loading emission limit, perform, or have performed, RM 5 on the holder baghouse. The test shall occur within a reasonable timeframe, but no later than 30 days after discovery of the emissions. The results of the RM 5 test must be submitted to SRCAA as soon as possible, but no later than 45 days after testing. If the standard is exceeded, the permittee must take appropriate and timely corrective action to address the problem.

Taking corrective action does not relieve the permittee from the obligation of reporting any permit deviations as required in Condition 30-Prompt Reporting of Deviations.

The permittee must maintain records of each verification and certification required under a. above. Records must include the date and time of the action, observations made, any verifications made regarding a.i. and/or a.ii., the results of any RM 5 tests, a description of any corrective action taken, and any other information required in permit condition 24-Records of Required Monitoring Information. Records must be kept in accordance with the permit term regarding Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)\* - see note on page 5] [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/8/07 – STATE/LOCAL ONLY]

**9M.** The permittee shall submit a monthly report to SRCAA that includes the following information for the previous month:

- a. A report of the daily total PM and PM10 emissions from all melter furnaces combined and total PM and PM10 emissions from the melter furnaces for that month;
- b. The monthly total PM, PM10, and CO combined emissions from DC-6 and DC-7 melters for that month, calculated according to Conditions 75 and 76;
- c. A report of the excess emissions documented by the dry scrubbing/baghouse system's continuous opacity monitoring system (COMS) for the previous month, if any, including the range of the excess emissions in percent opacity, the date and time of the commencement and completion of each period of excess emissions, and the cause of such emissions, if determined. If a malfunction is indicated in the report, any corrective actions taken shall also be described. Where no excess emissions have occurred in a month, then the report shall contain a statement to that effect.
- d. A report of the COMS malfunctions and corrective actions taken. The report shall also document the date and times when the COMS was inoperative or was being repaired or adjusted, together with an indication of whether the process whose emissions were monitored by the COMS was operative or inoperative at the time. If the COMS was inoperative due to malfunction, the report shall indicate the nature of the malfunction and the corrective action taken.
- e. The time, duration, and circumstances of each by-pass of the dry scrubbing/baghouse system that occurred during the month covered by the report.
- f. The total number of operating hours for each melter and holder furnace for the month;
- g. The number of 60-minute periods during which each melter furnace and holder furnace baghouse exceeded an average opacity of 10 percent (60-minute average);
- h. The number of 60-minute periods during which each melter furnace and holder furnace baghouse exceeded an average opacity above 24% (60-minute average);
- i. The number of 30-minute periods during which each melter furnace and holder furnace baghouse exceeded an average opacity above 40% (30-minute average);
- j. The number of hours for each melter furnace and holder furnace baghouse that its COMS was not operational;
- k. For each 60-minute period during which the 24% (60-minute average) opacity limit was exceeded, the following:
  - i. The time (60-minute period), duration, magnitude, and furnace(s) involved;
  - ii. The probable cause; and
  - iii. Action planned to prevent any recurrence.
- l. For each 30-minute period during which the 40% (30-minute average) opacity limit was exceeded, the following:

- i. The time (30-minute period), duration, magnitude, and furnace(s) involved;
- ii. The probable cause; and
- iii. Action planned to prevent any recurrence.

The reports must be submitted by the 25<sup>th</sup> of each month following the reporting month.

[SRCAA Order #96-03, Condition B, 4/24/96, as revised on 10/4/00] [NOC #660, Condition 13, 9/29/99 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY] [WAC 173-401-615, 9/16/02] [NOC #1410, Condition 18, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 18, 7/18/08, as revised on 10/30/09 and 3/19/10]

**10M.** Compliance with the melter furnaces daily PM10 limit shall be determined using each furnace's opacity monitor in the following manner. For each furnace, a day (24 hour period beginning at midnight and ending at the following midnight) will be divided into six (6) consecutive four (4) hour time blocks to represent theoretical furnace cycles. For each furnace,  $i$ , each four (4) hour block,  $j$ , shall be processed to obtain the maximum average opacity for any one hour interval during that four hour period,  $OP_{ij}$ . This value shall then be used in Equation 1 to calculate that furnace's PM grainloading for that four hour block,  $GL_{ij}$ :

Equation 1  $GL_{ij} = 0.003694 * OP_{ij} + 0.004699$

where  $GL_{ij}$  = PM grainloading in grains per dry standard cubic foot for the  $i^{\text{th}}$  furnace for the  $j^{\text{th}}$  four hour block  
 $OP_{ij}$  = highest 60 minute average opacity for the  $i^{\text{th}}$  furnace for the  $j^{\text{th}}$  four hour block

Equation 2 shall be used to calculate PM emissions in pounds,  $PM_{ij}$ , from the  $i^{\text{th}}$  furnace, for the  $j^{\text{th}}$  four hour block during each day. The airflow for each furnace,  $AF_i$ , shall be based on furnace design flow rates, taking into account operating conditions and other factors affecting flow, and shall be in units of dry standard cubic feet per minute.

Equation 2  $PM_{ij} = \frac{GL_{ij} * AF_i * 60 * 4}{7000}$

Equation 3 shall be used to calculate daily PM emissions in pounds for all furnaces combined, PM.

Equation 3  $PM = \sum_{i=1}^{10} \sum_{j=1}^{10} PM_{ij}$

PM10 emissions shall be assumed to equal PM emissions unless the permittee provides appropriate technical documentation to establish otherwise as allowed in Condition E of SRCAA Order #96-03.

If opacity monitor data are not available for an operating furnace,  $OP_{ij}$  for the furnace shall be

estimated using any of the following methods:

- a. the average  $OP_{ij}$  during that period, measured by COMS on operating furnaces that are charging similar materials;
- b. the highest  $OP_{ij}$  measured by the other COMS on operating furnaces for that period; or
- c. if circumstances suggest that the methods in i. and ii. above are inappropriate (e.g., if a number of monitors are down and high opacity readings from an operating monitor result in emission calculations that are biased high), the permittee may calculate emissions for the furnace using an alternate procedure, based on process parameters which are indicative of the emissions from the furnace (e.g., type of charge, activities occurring in the furnace, any EPA Reference Method tests performed, historic COM data, etc...), provided that the alternate method is approved in advance by the SRCAA Control Officer.

[SRCAA Order #96-03, Condition A, 4/24/96 as revised on 10/4/00]

**11M.** If used, records of either annual solid flux additive usage or purchases shall be kept, along with records of the total annual amount of metal charged to all melters. Chlorine emissions (as total chlorine in both hydrogen chloride and chlorine gas) shall be determined by dividing the annual amount of chlorine emitted (in pounds) by the total annual amount of metal charged (in tons). All chlorine in the additives shall be assumed to be emitted unless testing is conducted that demonstrates the ratio of the total chlorine added to that which is actually emitted. If such testing is done and the results are approved by SRCAA, the established ratio may be used to calculate emissions. [NOC #660, Condition 10.b, 9/29/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY] [NOC #683, Condition 11.b.ii, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01] [NOC #676, Condition 11.b.ii, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01]

**12M.** The following records shall be kept for a period of at least five years and made available to SRCAA upon request:

- a. Records of daily reagent use in the holder furnaces dry scrubbing baghouse system [NOC #660, Condition 3, 9/29/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY]; and
- b. Records of aggregate daily chlorine use in the holders [NOC #660, Condition 4, 9/29/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY]

**13M.** To determine the reagent availability ratio, the daily amount of unreacted reagent in each cell of the baghouse shall be calculated. In the case where no more than one cell is cleaned on a single day, Equations 1 and 2 shall be used for this calculation, where:

$C(k,i)$  = the amount of unreacted reagent in cell, k, for day, i, in units of pounds of HCl that can be controlled

$R_i$  = the amount of reagent fed into the baghouse system on day, i, in pounds

$X_{hcl}$  = the amount of HCl that is generated for every pound of flux used. [Note: Based on previous testing, a value of 0.48 shall be used when using chlorine flux and 0.272 shall be used when using Zendox as the solid flux in the holders. This

value may be revised, upon SRCAA's approval, provided that test data supports the revised factor.

Phcl = the amount of HCl that can be controlled by the reagent, in units of pounds of HCl per pound of reagent. For Trona, this value is 0.472. For any alternate reagent, a corresponding new value of Phcl will need to be determined.

Fi = the amount of flux used for day, i, in pounds

j = the cell that was cleaned at the start of day, i

Equation 1 – If k is not equal to j (i.e., the calculation is being done for a cell that was not cleaned at the start of the day)

$$C(k,i) = C(k,i-1) + 1/6 * (Phcl * Ri - Xhcl * Fi)$$

Equation 2 – If k is equal to j (i.e., the calculation is being done for the cell that was cleaned at the start of the day):

$$C(k,i) = 1/6 * (Phcl * Ri - Xhcl * Fi)$$

The pressure drop in the dry scrubbing baghouse shall be maintained at a minimum of 2 inches of water, or an alternate minimum pressure drop, approved by SRCAA. Before each cell in the baghouse is cleaned, the Rosemount system shall check the pressure drop across the baghouse. If the pressure drop is below 3.5 inches of water, the cell shall not be cleaned. At least semiannually, a check shall be performed to verify that the Rosemount system is programmed so that cell cleaning is not performed if the pressure drop is below 3.5 inches of water. Semiannual checks shall be completed by July 31, for first half of the year (January through June) and January 31 for the second half of the year (July through December). Each check shall include a written statement from the Casting Department, Environmental Department, or an equivalent department, certifying that the required Rosemount programming is in place. Records shall be kept of each check.

If more than one cell must be cleaned in a day, due to the pressure drop being too high or another operational problem, the cleaning schedule may be revised with SRCAA's approval. Prior to commencing a new cleaning schedule, Equations 1 and 2, used to calculate unreacted reagent, shall be revised to incorporate the new cleaning schedule. SRCAA approval shall be obtained before any new or revised equations are implemented. However, if at any time the pressure drop rises above 9 inches of water, or an alternate maximum pressure drop approved by SRCAA, a cell may be cleaned.

From Equations 1 and 2, the reagent availability ratio, ARi, for day i, shall be calculated from Equation 3:

Equation 3:

$$ARi = \frac{C(1,i) + C(2,i) + C(3,i) + C(4,i) + C(5,i) + C(6,i) + Xhcl * Fi}{Xhcl * Fi}$$

To assure there is adequate unreacted reagent in the baghouse at all times, if the reagent feed system is not running at the time of a scheduled cell cleaning (i.e., there is a breakdown of the feeder), the cell shall not be cleaned.

[NOC #676, Condition 7, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, 11/27/01, 3/14/03 (clarification letter), 4/8/03 (letter approving value of Xhcl for Zendox), and 7/11/03 (letter approving alternate minimum pressure drop for baghouse)] [NOC #683, Condition 7, 5/29/96 as revised on 10/25/99, 6/26/01, 11/27/01, 3/14/03 (clarification letter), 4/8/03 (letter approving value of Xhcl for Zendox), and 7/11/03 (letter approving alternate minimum pressure drop for baghouse)]

**14M.** The holder baghouse target reagent feed rate, TRF, shall be calculated, using Equation 4 below, where:

TRF = target reagent feed rate, in pounds per hour

Xhcl = the amount of HCl that is generated for every pound of flux used. Based on previous testing, a value of 0.48 shall be used when using chlorine flux and 0.272 shall be used when using Zendox as the solid flux in the holders. This value may be revised, upon SRCAA's approval, provided that test data supports the revised factor.

Phcl = the amount of HCl that can be controlled by the holder baghouse reagent, in units of pounds of HCl per pound of reagent. For Trona, this value is 0.472. For any alternate reagent, a corresponding value of Phcl shall be determined.

Favg = the average hourly flux usage rate in pounds per hour, based on the previous calendar month's flux usage. For months when both solid flux and chlorine flux are used, the average hourly solid flux usage rate and average hourly chlorine flux usage rate shall both be calculated.

Equation 4:

$$\frac{TRF * Phcl}{Xhcl * Favg} \geq 1.3$$

By the end of the fifth business day (i.e., Monday through Friday, excluding holidays) of each month, Favg shall be calculated for the previous month, and the target reagent feed rate, TRF, shall be calculated for the current month.

For months when both solid flux and chlorine flux are used, the denominator of Equation 4 shall be calculated as follows:

$Xhcl * Favg = Xhcl \text{ for chlorine flux} * \text{average hourly chlorine gas flux rate in pounds per hour} + Xhcl \text{ for solid flux} * \text{average hourly solid flux rate in pounds per hour}$

[NOC #676, Condition 8, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, 11/27/01, and 4/8/03 (letter approving value of Xhcl for Zendox)] [NOC #683, Condition 8, 5/29/96 as revised on 10/25/99, 6/26/01, 11/27/01, and 4/8/03 (letter approving value of Xhcl for Zendox)]

**15M.** Except as provided in Condition 23 – Monitoring System Malfunctions, operating parameters, affected by HCl emissions, shall be monitored in accordance with the following:

- a. If flux is used in the melters, monitoring shall be in accordance with 40 CFR §63.1510(j), or an alternate procedure approved under §63.1510(w).
- b. The total amount of reagent added to the dry scrubbing baghouse system shall be monitored, using a continuous parameter monitoring system. A daily total of reagent added shall be calculated and recorded. In addition, the reagent feed rate shall be monitored and recorded at least once each day when the dry scrubbing baghouse is in operation.

[NOC #676, Condition 9, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, and 11/27/01]  
[NOC #683, Condition 9, 5/29/96 as revised on 10/25/99, 6/26/01, and 11/27/01]

**16M.** Except as provided in Condition 23 – Monitoring System Malfunctions, the following records shall be kept in accordance with Condition 28 - Retention of Records, and, upon request, such records shall be made available for inspection by SRCOA staff or other authorized representatives:

- a. a record of the total amount of reagent added to the holder baghouse for each hour during which the holder furnaces dry scrubbing baghouse system operated;
- b. a record of the total amount of chlorine used for each hour during which the holder furnaces operated, calculated as the monthly total chlorine usage divided by the total number of hours the holder furnace operated during that month. The monthly total chlorine usage should be calculated based on monthly total solid flux usage and a determination of the pounds of chlorine per unit mass of solid flux.
- c. a record of the reagent feed rate setting for each day during which the holder furnaces dry scrubbing baghouse system operated;
- d. a record of the amount of reagent injected into the dry scrubbing baghouse system for each day of operation;
- e. a record of the amount of chlorine flux and the amount of solid flux used in the holder furnaces, for each day of operation;
- f. a record of the semi-annual check to verify that the Rosemount system is programmed so that baghouse cleaning is not performed if the pressure drop is below 3.5 inches of water;
- g. a record of the calculated reagent availability ratio for each day of operation;
- h. a record of the average hourly flux usage rate in pounds per hour for each month; and
- i. a record of the target reagent feed rate for each month.

[NOC #676, Condition 10, 7/10/96 as revised on 11/26/96, 10/25/99, 6/26/01, 11/27/01, and 3/14/03 (clarification letter)] [NOC #683, Condition 10, 5/29/96 as revised on 10/25/99, 6/26/01,

11/27/01, and 3/14/03 (clarification letter)]

**17M.** Anytime the by-pass stack(s) associated with the holder furnaces dry scrubbing/baghouse system is used, it shall be considered a breakdown, and SRCAA shall be notified as soon as possible but no later than 24 hours after the breakdown begins. Notification may occur by telephone, a message left on SRCAA's voicemail system, or facsimile transmission. Notification shall be confirmed by letter. The by-pass may continue until the close of the first business day following the day on which the by-pass began or until repairs are completed, whichever is sooner. SRCAA may approve a longer by-pass period upon request. At any time when the emission control system has been by-passed, the permittee shall implement the SRCAA approved HOLDER BAGHOUSE BREAKDOWN PROCEDURE to minimize visible emissions from the holders.

All by-passes shall be reported on the monthly report required in Condition 9M above. The monthly report shall describe the time and duration of the by-pass and the circumstances that made the by-pass necessary. [NOC #660, Condition 9, 9/29/95 as revised on 10/25/99 and 11/7/00 – STATE/LOCAL ONLY]

**18M.** To verify that scalping occurs only when the wet cyclone is properly operating, either a. or b. shall be done:

- a. At least once per week, a check shall be performed to verify that the wet cyclone fan and pump are running during processing of ingot, according to the following:
  - i. If the scalper is operating during the check, a visual check shall be performed that the fans and pumps are on; or
  - ii. If the scalper is not operating during the check, a check shall be performed using the VAX system, or equivalent computer system, to verify that on the previous day, or earlier that day, the fans and pumps were running;
- b. The checks described in a. shall be performed at least once per month. In addition, at least semiannually, a check shall be performed to verify that the programmable logic controller (PLC) is programmed in accordance with Condition 112. Semiannual checks shall be completed by July 31 for the first half of the year (January through June) and January 31 for the second half of the year (July through December). Each check shall include a written statement from the Hot Line Department, the Automation and Control Engineering Group, or an equivalent department, certifying that the required PLC programming is in place, with a hardcopy of the PLC logic attached.

Records of operating parameters shall be kept and shall include information required in Condition 24- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #188, Condition 4, 3/4/88 as revised on 4/8/88 and 1/18/01]

**19M.** The operation and maintenance procedures and designated settings in the operating manual accompanying the ingot soaking pit burner units shall be followed. Records shall be

kept to document that the operating and maintenance procedures are being followed. Records shall include information required in Condition 24- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #443, Condition 5, 7/21/93]

**20M.** The operation and maintenance procedures and designated settings in the manufacturer's operating manual for the pusher furnace shall be followed. Records shall be kept to document that the operating and maintenance procedures are being followed. Records shall include information required in Condition 24- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #674, Condition 2, 12/15/95] [WAC 173-401-630, 8/15/01]

**21M.** Monthly records of fuel use for the pusher furnace, or of an alternate parameter as approved by SRCAA (e.g., pounds of aluminum produced), shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #674, Condition 7, 12/15/95] [WAC 173-401-630, 10/4/93]

**22M.** The operation and maintenance manual developed for the 80" Rolling Mill, HL-1 shall be followed. At a minimum, the manual shall include a description and schedule of maintenance performed on the motors and fans associated with the Busch inertial separators. Records shall be kept to document that the operating and maintenance manual is being followed. Records shall include information required in Condition 24- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02]

**23M.** Maintenance records shall be kept for the inert annealing furnaces' electrostatic precipitator(s). Compliance with the requirement may be demonstrated by implementing a computerized preventative maintenance system that regularly schedules and tracks maintenance activities. Records shall include information required in Condition 24- Records of Required Monitoring Information and shall be kept for five years in accordance with Condition 28- Retention of Records. Upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #69, Condition 2, 3/16/84 as revised on 2/26/96] [WAC 173-401-630, 10/4/93]

**24M.** The boilers shall be inspected at least once each calendar year and if needed, serviced, as required at least once each calendar year to assure proper combustion is occurring and that the units are in proper operating condition. At a minimum, the inspection shall include checking the burners and fire brick. If deterioration, sufficient to affect proper combustion is found, corrective action shall be taken before the unit is re-fired. The permittee shall maintain records of each inspection and records of any corrective action. The records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02]

**25M.** Prior to transfer, each batch of used oil transferred to the tanks, located at the boiler house steam plant, shall be tested to determine the flashpoint and content of ash, cadmium, chromium, lead, arsenic, halogens, polychlorinated biphenyls, and sulfur. Records of each test shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02]

**26M.** The operation and maintenance plan for the waste water treatment scrubbers approved under NOCs #681 and #881 shall be followed. At a minimum, the plan shall incorporate manufacturer recommended operation and maintenance procedures. Changes to the plan shall be approved by SRCAA prior to implementing such changes. Maintenance records shall be kept to verify that the scrubber is being properly maintained. A computerized preventative maintenance system that regularly schedules and tracks maintenance activities may be used to meet the recordkeeping requirement. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #881, Conditions 2, 4, & 5, 5/8/98] [NOC #681, Conditions 1, 2, & 3, 2/28/96]

**27M.** Except as provided in Condition 22 – Data Recovery, records shall be kept of the average daily pH (24-hour block average) of the scrubbing medium for the scrubber approved under NOC #881. If the pH falls below 7.5 when the scrubber is operating, corrective action shall be taken as soon as possible, but no later than three days from discovery, to bring the pH above 7.5.

Taking corrective action does not relieve the permittee from complying with the pH requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations.

Records of the daily average and any corrective action taken as a result of a pH reading shall be kept in accordance with Condition 28-Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02]

**28M.** The permittee shall implement the written MACT operation, maintenance, and monitoring (OM&M) plan for each affected source and emission unit in the SAPU. The permittee must comply with all of the provisions of the MACT OM&M plan most recently approved by SRCAA, unless and until the plan is revised in accordance with the following procedures. If SRCAA determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of 40 CFR 63, Subpart RRR, the permittee must promptly make all necessary revisions and resubmit the revised plan. If the permittee determines that any other revisions of the MACT 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 SRCAA.

The MACT OM&M 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 operation and maintenance of each process unit and add-on control device, necessary to meet the applicable emission limits in 40 CFR §63.1505;
- d. Procedures for the operation and maintenance of monitoring devices or systems, necessary 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 provisions in 40 CFR 63, Subpart A.
- e. Procedures for monitoring process and control device parameters, and if applicable, the procedure to be used for determining charge/feed 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 established value or range (see a. above) , including:
  - i. Procedures to determine and record the cause of a deviation or excursion, and time and date the deviation or excursion began and ended; and
  - ii. Procedures for recording the corrective action taken, the time and date corrective action was initiated, and the time and 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; and
- h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a written site-specific monitoring plan for the group 1 furnaces without add-on air pollution control devices. The site specific monitoring plan must address monitoring and compliance requirements for D/F from these group 1 furnaces. The permittee must comply with the most recently SRCAA approved site specific monitoring plan. The plan must contain sufficient provisions to ensure continuing compliance with applicable emission limits and must demonstrate, based on documented test results, the relationship between emissions of D/F and the proposed monitoring parameters. Test data must establish the highest level of D/F that will be emitted from the group 1 furnaces without add-on air pollution control devices. The site-specific monitoring plan must meet the following requirements:
  - i. The plan must document each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards;
  - ii. The plan must include provisions for unit labeling as required in §63.1510(c), feed/charge weight measurement as required in §63.1510(e), and flux weight measurement as required in §63.1510(j),
  - iii. If a continuous opacity monitoring system is included in the 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 40 CFR 63,

Subpart RRR.

- iv. If the 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. The 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 the melters; and
  - F. Recordkeeping requirements to document conformance with plan requirements.
- i. The MACT OM&M plan must include the following for the secondary aluminum processing unit (SAPU):
  - i. The identification of each emission unit in the SAPU;
  - ii. The specific control technology or pollution prevention measure to be used for each emission unit in the SAPU and the date of its installation or application;
  - iii. The emission limit calculated for the SAPU 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 40 CFR 63, Subpart RRR; and
  - v. The monitoring requirements applicable to each emission unit in the SAPU and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling averaging using the procedures in §63.1510(t).
- j. The SAPU compliance procedures within the MACT 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 the SAPU;
  - iii. The inclusion of any emission unit while it is shutdown; or
  - iv. The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- k. To revise the SAPU compliance provisions within the MACT OM&M plan, the permittee must submit a revision request to SRCAA and obtain approval from SRCAA prior to implementing any revisions.

[40 CFR §63.1510(a), (b), (o), (p), & (s), 9/3/04] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 13.b., 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 13.b., 7/18/08, as revised on 10/30/09 and 3/19/10]

**29M.** The permittee shall inspect the labels for each emission unit in the SAPU at least once per calendar month to confirm that posted labels are intact and legible, as required by 40 CFR §63.1506(b).

[40 CFR §63.1510(a) & (c), 9/3/04] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 14, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 14, 7/18/08, as revised on 10/30/09 and 3/19/10]

**30M.** For each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or ug/Mg (gr/ton) in 40 CFR 63, Subpart RRR, (i.e., SAPU), the permittee 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 the SAPU must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to SRCAA to determine the total weight of feed/charge or aluminum production to the affected source or emission unit. The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured. If the required accuracy cannot be achieved as a result of equipment layout or changing practices, the permittee may submit a written request to SRCAA for approval to use a device of alternative accuracy. The written request must include assurance through data and information that the affected source will meet the relevant emission standard. The permittee 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 six months.

[40 CFR §63.1510(a) & (e), 9/3/04] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 10, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 10, 7/18/08, as revised on 10/30/09 and 3/19/10]

**31M.** If reactive flux is used in the SAPU (i.e., melter furnaces or induction furnaces), the permittee must install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each SAPU emission unit or affected source in accordance with the following:

- a. The monitoring system must record the weight for each 15-minute block period, during which the reactive fluxing occurs, over the same operating cycle or time period used in the performance test. For each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux shall be recorded for each addition of:
  - i. Gaseous or liquid reactive flux other than chlorine; and
  - ii. Solid reactive flux.
- b. The accuracy of the weight measurement device must be  $\pm 1$  percent of the weight of the reactive component of the flux being measured. The permittee may apply to SRCAA for permission to use a weight measurement device of alternate accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of  $\pm 1$  percent impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet

the relevant emission standards.

- c. The permittee 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.
- d. The gaseous or liquid reactive flux injection rate and total reactive flux injection rate (kg/Mg or lb/ton) shall be calculated and recorded for each operating cycle or time period used in the performance test using the procedure in 40 CFR §63.1512(o).
- e. The permittee may apply to the Administrator for approval of an alternate method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternate monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.

[40 CFR §63.1510(a) & (j), 9/3/04] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 11, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 11, 7/18/08, as revised on 10/30/09 and 3/19/10]

**32M.** Except as provided in 40 CFR §63.1510(u), the permittee must record the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit (SAPU) on a daily basis.

To calculate the 3-day, 24-hour rolling average, the permittee must:

- a. Calculate and record the total weight of material charged to each emission unit in the SAPU for each 24-hour day of operation using the feed/charge weight information required in 40 CFR §63.1510(e). If the permittee 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 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 determine 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 determine the daily emission rate for the SAPU;
- d. Compute the 24-hour daily emission rate, using Equation 4 in 40 CFR §63.1510(t)(4); and
- e. Calculate and record the 3-day, 24-hour rolling average for D/F each day by summing the daily emission rates over the 3 most recent consecutive days and dividing by 3.

[40 CFR §63.1510(a), (t), & (u), 9/3/04] [WAC 173-400-075(5), 5/8/07]

**33M.** The permittee shall follow the most recently SRCAA approved MACT OM&M plan that contains 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 equipment used to comply with the standard, as described in 40 CFR §63.6(e)(3). The permittee shall keep records of each event as required by 40 CFR §63.10(b). In addition to the information required in 40 CFR §63.6(e)(3), the plan must include the following:

- a. Procedures to determine and record the cause of the malfunction and the time and date 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.

[40 CFR §63.1516(a), 4/20/06] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 13.c., 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 13.c., 7/18/08, as revised on 10/30/09 and 3/19/10]

**34M.** If actions taken by the permittee during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation given in 40 CFR 63, Subpart RRR), or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan (see Condition 33M), the permittee shall state such information in a startup, shutdown, and malfunction report (S/S/M report). Actions taken to minimize emissions during such startups, shutdowns, and malfunctions shall be summarized in the report and may be done in checklist form; if actions taken are the same for each event, only one checklist is necessary. Such a report shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period. The S/S/M report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy. S/S/M reports shall be submitted to SRCAA semiannually with the monitoring reports required in Condition 29.

[40 CFR §63.10(d)(5)(i), 4/20/06] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 19, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 19, 7/18/08, as revised on 10/30/09 and 3/19/10]

**35M.** Any time an action taken by the permittee during a startup or shutdown that caused the source to exceed any applicable (D/F) emission limitation in the relevant emission standards, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan (see Condition 33M), the permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event. The immediate report shall consist of a telephone call (or facsimile (FAX) transmission) to SRCAA within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have

occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions in conformance with §63.6(e)(1)(i).

[40 CFR §63.10(d)(5)(ii), 4/20/06] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 20, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 20, 7/18/08, as revised on 10/30/09 and 3/19/10]

**36M.** The permittee shall maintain files of all information (including all reports and notifications) required by the MACT OM&M plan, 40 CFR 63, Subpart A and Subpart RRR. The permittee 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. The records may be kept on microfilm, computer disks, magnetic tape, or microfiche. In addition to the general records required by 40 CFR §63.10(b), the permittee must maintain the following records:

- a. For each continuous monitoring system, records required by 40 CFR 63.10(c).
- b. 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.
- c. Approved site-specific monitoring plan for a group 1 furnace without add-on air pollution control devices with records documenting conformance with the plan.
- d. Records for monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.
- e. Records of any approved alternative monitoring or test procedure.
- f. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including the startup, shutdown, and malfunction plan, OM&M plan, and the site-specific secondary aluminum processing unit plan.
- g. For the SAPU, records, of total charge weight, or if the permittee 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.
- h. Maintenance records for DC-6 and DC-7 melters.
- i. Monthly charge records for DC-6 and DC-7 melters.
- j. Monthly natural gas usage records for DC-6 and DC-7 melters.

[40 CFR §63.1517, 12/30/02] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 17, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 17, 7/18/08, as revised on 10/30/09 and 3/19/10]

**37M.** Monthly production and usage records of parameters necessary to demonstrate compliance with the HAPs emission limitations given in Conditions 68 and 69 shall be kept on-site for a minimum of five years and made available to SRCAA personnel upon request. These records shall include, but are not limited to:

- Total charge to the melters and holders (tons/month);
- Chlorine gas usage, if applicable (lbs/month);
- Solid flux (sodium scavenging additive) usage in the holders (lbs/month);
- Sodium scavenging additive usage in the melters (lbs/month);
- Use of volatile organic HAP containing materials (gal/month);
- Natural gas burned (million cubic feet/month);
- Diesel burned, if applicable (1000's of gal/month); and
- Used oil burned, if applicable (1000's of gal/month).

[SRCAA Order #03-01, Condition A, 3/3/03]

**38M.** By the 25<sup>th</sup> of each calendar month, the permittee shall perform calculations to quantify HCl, Cl<sub>2</sub>, and total HAPs emitted during the previous month. Calculations shall be performed using the equations given in SRCAA Order #03-01. In addition, the permittee shall perform calculations to quantify HCl, Cl<sub>2</sub>, and total HAP emissions for the previous 12-month period, to verify that the emission limitations given in Conditions 68 and 69 are being met. To ensure that all individual HAPs stay below the emission limitation given in Condition 68, any time the 12-month total of combustion HAP emissions, metal HAP emissions, and/or Volatile Organic HAP containing material emissions, calculated according to the equations given in SRCAA Order #03-01, exceed 19,000 pounds (9.5 tons), the permittee shall calculate the total emissions during the previous 12-month period for each individual HAP. All emission calculations shall be performed in accordance with the latest version of the SRCAA approved "HAP Emission Calculation Plan," required in Condition 39M. Emission calculation records shall be kept on-site for a minimum of five years and made available to SRCAA upon request.

[SRCAA Order #03-01, Condition B, 3/3/03]

**39M.** The permittee shall follow the most recent SRCAA approved "HAP Emission Calculation Plan," (HECP). All revisions to the HECP must be approved by SRCAA prior to implementation.

[SRCAA Order #03-01, Condition C, 3/3/03]

**40M.** The permittee shall follow the most recent SRCAA approved Horizontal Heat Treat Furnaces Operation and Maintenance (O&M) Plan.

The O&M plan and the completed recordkeeping forms used to document maintenance activities performed on the heat treat ovens shall be kept on-site for the previous five years of operation and made available to SRCAA personnel upon request.

[NOC #1322, Condition 2 & 8 a., 2/8/06, as revised on 10/30/09] [NOC #1334, Condition 2 & 8 a., 2/21/06 as revised on 11/16/07 and 10/30/09] [NOC #1366, Condition 2 & 8 a., 10/27/06, as revised on 10/30/09]

**41M.** The permittee shall perform a combustion test on each heat treat oven at maximum fire using a combustion analyzer or other SRCAA approved test method. Each combustion test shall reflect oven operation under actual conditions. The testing, specified below, shall be performed in accordance with SRCAA Regulation I, Section 2.09 unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a. The permittee shall perform a combustion test on HHT-1, HHT-2, and HHT-3 at least once during each calendar year, unless SRCAA approves a less frequent testing schedule.
- b. The combustion test shall be capable of analyzing for NO<sub>x</sub> and CO emissions.
- c. The combustion analyzer shall be calibrated using certified calibration gases, immediately prior to the test.
- d. During each combustion test, the following operational parameters shall be measured and recorded:
  - i) NO<sub>x</sub> and CO concentrations (ppmv) in the exhaust stream;
  - ii) Percent O<sub>2</sub> for each NO<sub>x</sub> and CO reading; and
  - iii) Average load.
- e. A report documenting the results of each combustion test shall be submitted to SRCAA within 30 days of each test. The report shall include:
  - i) A calibration report for the combustion analyzer;
  - ii) A summary of the NO<sub>x</sub> and CO emissions given in ppmv and corrected to 3% oxygen;  
$$[\text{NO}_x, \text{ or CO}] \text{ ppmv (@ 3\% O}_2) = \text{Measured } [\text{NO}_x, \text{ or CO}] \text{ ppmv} \times \frac{(20.9-3)}{(20.9-\text{Measured } [\text{NO}_x, \text{ or CO}] \text{ \%O}_2)}$$

(Example: Measured NO<sub>x</sub> = 20 ppmv @ 7.5% O<sub>2</sub>, & CO = 30 ppmv @ 8.5% O<sub>2</sub>;  
therefore, NO<sub>x</sub> @ 3% O<sub>2</sub> = 20 x  $\frac{(20.9-3)}{(20.9-7.5)}$  = **26.7** ppmv NO<sub>x</sub> @ 3% O<sub>2</sub>, and  
$$\text{CO @ 3\% O}_2 = 30 \times \frac{(20.9-3)}{(20.9-8.5)} = \mathbf{43.3} \text{ ppmv CO @ 3\% O}_2$$
  - iii) The parameters listed under d.; and
  - iv) Copies of actual data sheets.

A copy of each combustion test performed on the heat treat ovens shall be kept on-site for five years and made available to SRCAA personnel upon request.

[NOC #1322, Conditions 3 & 8 b., 2/8/06, as revised on 10/30/09] [NOC #1334, Conditions 3 & 8 b., 2/21/06 as revised on 11/16/07 and 10/30/09] [NOC #1366, Conditions 3 & 8 b., 10/27/06, as revised on 10/30/09]

**42M.** No later than the 25<sup>th</sup> of each month, the amount of natural gas burned in each heat treat oven during the previous month shall be totaled and recorded. If the permittee is tracking monthly natural gas usage, gas meter data must be used. If the permittee is tracking daily gas usage and totaling the daily usages at the end of each month, the permittee may estimate the daily gas usage when daily gas usage is not available due to unavoidable circumstances (e.g., utility database data recovery interruptions, etc.), provided that the following requirements are met:

- a. Daily gas usage may be estimated for no more than three consecutive days and no more than ten days total in any month, unless SRCAA approves a longer time period.
- b. The daily gas usage shall be estimated using the average daily gas usage from the melter during the same month, except if the daily gas usage is estimated during the first five days of the month, the average daily gas usage from the previous month should be used.

If the amount of natural gas burned in HHT-1 during any month exceeds 2.45 million scf, the amount of natural gas burned in HHT-1 during the last consecutive twelve month period shall be totaled and recorded. If the amount of natural gas burned in HHT-2 during any month exceeds 10.6 million scf, the amount of natural gas burned in HHT-2 during the last consecutive twelve month period shall be totaled and recorded. If the amount of natural gas burned in HHT-3 during any month exceeds 4.9 million scf, the amount of natural gas burned in HHT-3 during the last consecutive twelve month period shall be totaled and recorded. All fuel usage records shall be kept for 5 years and made available to SRCAA personnel upon request.

[NOC #1322, Condition 7 & 8 c., 2/8/06, as revised on 10/30/09] [NOC #1334, Condition 7 & 8 c., 2/21/06 as revised on 11/16/07 and 10/30/09] [NOC #1366, Condition 7 & 8 c., 10/27/06, as revised on 10/30/09]

**43M.** An operation and maintenance (O&M) plan shall be developed and followed for the emergency generator set associated with the heat treat ovens. The O&M plan shall provide a detailed description of how the generator set will be operated to minimize air emissions. Manufacturer O&M plans/manual are generally acceptable. The O&M plan must be kept on site and made available to SRCAA personnel upon request. Maintenance records shall be kept for the emergency generator set and shall include, at a minimum, dates and nature of any maintenance performed. Records shall be kept The O&M plan and the completed recordkeeping forms used to document maintenance activities performed on the heat treat ovens shall be kept on-site for the previous five years of operation and made available to SRCAA personnel upon request. [NOC #1335, Condition 4 & 10 a., 2/21/06]

**44M.** Records shall be kept, documenting the sulfur content of the fuel supplied to the emergency generator. Invoices constitute sufficient documentation, provided they show that each load of fuel received was low sulfur grade fuel. Records shall be kept for the previous five years of operation and made available to SRCAA personnel upon request. [NOC #1335, Condition 6 & 10 b., 2/21/06]

**45M.** No later than the 15<sup>th</sup> of each month, the hours of operation for the emergency generator during the previous month shall be totaled and recorded. If the hours of operation for the generator set during any month exceeds 77 hours, the hours of operation during the last consecutive twelve month period shall be totaled and recorded. All records shall be kept for the previous five years of operation and made available to SRCAA personnel upon request. [NOC #1335, Condition 7 & 10 c., 2/21/06]

**46M.** The permittee shall develop an operation and maintenance (O&M) plan which provides a description of how the dust control system associated with the plate sander at Alutek will be operated to minimize air emissions. Manufacturers' instructions may be referenced. The most recent O&M plan developed must be kept on site and made available to SRCAA personnel

upon request. The O&M plan shall at a minimum include:

- i. Acceptable pressure drop range across the dust collector, as measured by the magnehelic pressure gauge;
- ii. Description of procedures that Kaiser will implement to prevent particulate matter from becoming airborne in the load-out area due to overfilling, disposal of collected particulate, etc.;
- iii. Description of required maintenance for the system, and the frequency of maintenance for the system;
- iv. Description of corrective actions to be taken in case of system failure or operation outside of normal operating parameters.

The dust collector shall be maintained and operated according to the O&M plan.

Records shall be kept of all inspection, monitoring, and maintenance activities performed on the dust collector. Records shall also be kept of times and dates of cartridge filter failures and change outs. All records shall be kept for the previous five years of operation and made available to SRCAA personnel upon request.

[NOC #1316, Condition 4 & 9, 11/7/05]

**47M.** The following shall function as Compliance Assurance Monitoring for the #4 Scalper wet cyclone (HL-6):

a) #4 Scalper Wet Cyclone Visible Emissions:

The permittee shall meet the requirements given in 1) and if triggered, the permittee shall meet the requirements given in a) 2), a) 3), and a) 4).

- 1) The permittee shall perform weekly inspections during daylight hours, while the #4 scalper is operating, for the purpose of observing points of visible emissions and PM emissions from the #4 scalper wet cyclone, HL-6.

The weekly inspections shall be conducted as follows:

- i) each inspection shall be conducted from a location(s) with a clear view of the #4 scalper wet cyclone exhaust where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the #4 scalper wet cyclone;
- ii) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
- iii) each inspection shall consist of a minimum 15-second visual observation of the #4 scalper wet cyclone; and

- iv) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from the #4 scalper wet cyclone during the weekly inspection, no additional action is required. If visible emissions are observed from the #4 scalper wet cyclone, the permittee shall take further action according to 2).

- 2) If visible emissions are observed from the #4 scalper wet cyclone, an excursion has occurred, and the permittee must verify that all equipment is performing its normal, designed function and is being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated as soon as possible, but within 12 hours of discovery of the problem. The goal of the corrective action taken shall be to eliminate visible emissions as soon as possible and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition 24- Records of Required Monitoring Information and Condition 28-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the corrective action taken results in a return to conditions under which visible emissions are not observable, no further corrective action is required. If visible emissions are still observed, the permittee shall take further action according to 3).
- 3) If after corrective action is taken, visible emissions are still observed, the permittee shall perform, or have performed, Ecology Method 9A and EPA Method 5 on the #4 scalper wet cyclone. The Ecology Method 9A and EPA Method 5 tests shall occur as soon as possible, but no later than 30 days after the subsequent observation of visible emissions. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition 24- Records of Required Monitoring Information and Condition 28-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
  - i) If the visible emissions, as determined by Ecology Method 9A, do not exceed any applicable opacity standards (i.e., standard given in Condition 96), and the particulate emissions, as determined by EPA Method 5, do not exceed any applicable particulate standards (i.e., standards given in Conditions 59 and 95), no further corrective action is required.
  - ii) If a violation of any applicable opacity standards (i.e., standards given in Conditions 51 and 52) is documented, and/or a violation of any applicable particulate standard (i.e., standard given in Condition 111), an exceedance has occurred, and appropriate corrective action shall be initiated as soon as possible, but no later than 24 hours

after discovery of the violation, to identify and correct the problem causing the exceedance. The goal of the corrective action taken shall be to achieve compliance with the opacity and particulate standards as soon as possible and to prevent recurrence of the problem. Once corrective action has been taken to address the problem, the permittee shall perform, or have performed, Ecology Method 9A (i.e., if an opacity exceedance occurred) and/or EPA Method 5 (i.e., if a particulate exceedance occurred) on the source of the emissions to demonstrate compliance with the opacity and/or particulate standards. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition 24-Records of Required Monitoring Information and Condition 28-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

- 4) The permittee shall report all #4 scalper wet cyclone opacity excursions and opacity and/or particulate matter exceedances to SRCAA as part of the semiannual monitoring report, described in Condition 29. The report shall include the date, time, duration, and magnitude of all excursions and exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

b) #4 Scalper Wet Cyclone Pumps and Fans Operational Status

To verify that scalping occurs only when the wet cyclone is properly operating, the permittee shall meet the requirements given in b) 1) and b) 2) and if triggered, the permittee shall meet the requirements given in b) 3), and b) 4).

- 1) Each time an ingot is scalped, a check shall be performed to verify that the wet cyclone fans and pumps are running using the VAX system, or equivalent computer system. Records shall be kept of each check, including the date and time of the check and the operational status of the wet cyclone fans and pumps. Records shall be recorded daily on the #4 scalper scorecard in accordance Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- 2) At least semiannually, a check shall be performed to verify that the programmable logic controller (PLC) for the #4 scalper is programmed in accordance with Condition 112. Semiannual checks shall be completed by July 31 for the first half of the year (January through June) and January 31 for the second half of the year (July through December). Each check shall include a written statement from the Hot Line Department, the Automation and Control Engineering Group, or an equivalent department, certifying that the required PLC programming is in place, with a hardcopy of the PLC logic attached. Records shall be kept in accordance with Condition 28- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

- 3) If the wet cyclone fans and pumps are not running when an ingot is scalped, or if the #4 scalper is not programmed in accordance with Condition 112, an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 12 hours from discovery, to return the equipment to normal operation (i.e., wet cyclone fans and pumps operational when ingot is scalped) and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30-Prompt Reporting of Deviations. Records shall be kept of the date, time, and duration of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition 24- Records of Required Monitoring Information and Condition 28-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
  - 4) The permittee shall report all excursions (occasions when wet cyclone fans and pumps are not running when ingot is scalped) to SRCAA as part of the semiannual monitoring report, described in Condition 29. The report shall include the date, time, and duration of all excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- c) If the permittee identifies an excursion or exceedance of an emission limitation for which this MRRR condition was designed to monitor but the MRRR condition did not provide an indication of an excursion or exceedance; or if testing results demonstrate that the indicator ranges given in this MRRR condition are not appropriate ranges for monitoring compliance, the permittee shall notify SRCAA and initiate procedures to modify this permit.

[40 CFR Part 64, 7/1/01]

**48M.** A source test must be conducted on the DC-6 and DC-7 melter furnaces at least once each calendar year, beginning in 2010. After five consecutive compliant tests, Kaiser may request an alternate test frequency. The testing, specified below, shall be performed in accordance with SRCAA Regulation I, Section 2.09 unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a. At least 15 calendar days prior to performing each source test, a test notification and plan shall be submitted to the SRCAA for review and approval.
- b. During the test, the melter shall be operated at the unit's highest production level, as dictated by downstream operations, with charge materials representative of the range of materials processed by the unit and at the highest reactive fluxing rate (sodium scavenging additives only) that Kaiser would like to operate the melters.
- c. Each source test shall consist of three separate test runs; pollutant sampling for each run must be conducted over the entire process operating cycle (period from furnace lid on with burners on to flat bath when melting is complete).
- d. During the test, the permittee shall measure and record the total weight of feed/charge to the melter for each of the three test runs and calculate and record the total weight.

- e. The following constituents shall be measured during each test run:
  - i. Volumetric flow rate and temperature, per EPA Methods 1 & 2;
  - ii. Oxygen (O<sub>2</sub>) & Carbon Dioxide (CO<sub>2</sub>), per EPA Method 3A;
  - iii. Moisture content, per EPA Method 4;
  - iv. Oxides of Nitrogen (NO<sub>x</sub>), per EPA Method 7E; and
  - v. Carbon Monoxide (CO), per EPA Method 10.
- f. In addition to the constituents listed in e., the following additional constituents shall be measured at least once each five calendar years, beginning in 2015:
  - i. Volatile Organic Compounds (VOC), per EPA Method 25A;
  - ii. Sulfur Dioxide (SO<sub>2</sub>), per EPA Method 6C; and
  - iii. Particulate matter, per EPA Methods 5 and 202.
- g. A report, detailing the source test results, shall be submitted to SRCAA for approval no later than 60 days after each test is performed.

[NOC #1410, Condition 7, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 7, 7/18/08, as revised on 10/30/09 and 3/19/10]

**49M.** The melters must be operated with charge materials that are representative of charge materials processed by the unit during the initial (D/F) source test, conducted according to 40 CFR §63.1512. If Kaiser would like approval to operate the melter(s) with alternate charge materials that are not representative of charge materials processed during the initial source test, the testing, specified below, shall be performed in accordance with SRCAA Regulation I, Section 2.09 and 40 CFR Part 63, unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a. At least 15 calendar days prior to performing the source test, the permittee shall submit a site-specific test plan to SRCAA for review and approval, which satisfies all of the requirements and obtain approval of the plan pursuant to the procedures set forth in 40 CFR §63.7(c).
- b. During the test, the melter shall be operated at the unit's highest production level with charge materials representative of the range of materials processed by the unit and at the highest reactive fluxing rate (sodium scavenging additives only, per Condition 5) that Kaiser would like to operate the melter.
- c. The source test shall consist of three separate test runs. Pollutant sampling for each dioxin / furan test run must be conducted over the entire melter furnace operating cycle (period between initial charging and transfer of aluminum to holder furnace).
- d. During the test, the permittee shall measure and record the total weight of feed/charge to the melter for each of the three test runs and calculate and record the total weight.
- e. During the test, the permittee shall use the procedures established in 40 CFR §63.1512(o) to establish an operating parameter value for the total reactive fluxing rate.
- f. The following constituents shall be measured during each test run:

- i. Volumetric flow rate and temperature, per EPA Methods 1 & 2;
  - ii. Oxygen (O<sub>2</sub>) & Carbon Dioxide (CO<sub>2</sub>), per EPA Method 3A;
  - iii. Moisture content, per EPA Method 4; and
  - iv. Dioxin / Furan, per EPA Method 23.
- g. A report, detailing the source test results, shall be submitted to SRCAA for approval no later than 60 days after the test is performed. The report must include the total reactive fluxing rate (sodium scavenging additives only, per Condition 5), established during the test, per §63.1512(o).

[40 CFR §63.1511, 12/30/02] [WAC 173-400-075(5), 5/8/07] [NOC #1410, Condition 6, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 6, 7/18/08, as revised on 10/30/09 and 3/19/10]

**50M.** No later than the 25<sup>th</sup> of each month, the amount of charge melted in DC-6 and DC-7 melter furnaces during the previous month shall be totaled and recorded. If the amount of charge melted in the DC-6 furnace during any month exceeds 10,265 tons, the amount of charge melted in DC-6 during the previous consecutive twelve month period shall be totaled and recorded. If the amount of charge melted in the DC-7 furnace during any month exceeds 6,159 tons, the amount of charge melted in DC-7 during the previous consecutive twelve month period shall be totaled and recorded. All records shall be kept for five years and made available to SRCAA personnel upon request. [NOC #1410, Condition 15, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 15, 7/18/08, as revised on 10/30/09 and 3/19/10]

**51M.** No later than the 25<sup>th</sup> of each month, the amount of natural gas burned in the DC-6 and DC-7 melter furnaces during the previous month shall be totaled and recorded. If the permittee is tracking monthly natural gas usage, gas meter data must be used. If the permittee is tracking daily gas usage and totaling the daily usages at the end of each month, the permittee may estimate the daily gas usage when daily gas usage is not available due to unavoidable circumstances (e.g., utility database data recovery interruptions, etc.), provided that the following requirements are met:

- b. Daily gas usage may be estimated for no more than three consecutive days and no more than ten days total in any month, unless SRCAA approves a longer time period.
- b. The daily gas usage shall be estimated using the average daily gas usage from the melter during the same month, except if the daily gas usage is estimated during the first five days of the month, the average daily gas usage from the previous month should be used.

If the amount of natural gas burned in either the DC-6 or DC-7 furnace during any month exceeds 19.7 million scf, the amount of natural gas burned in that furnace during the previous consecutive twelve month period shall be totaled and recorded. All records shall be kept for five years and made available to SRCAA personnel upon request. [NOC #1410, Condition 16, 4/28/08, as revised on 10/30/09 and 3/19/10] [NOC #1427, Condition 16, 7/18/08, as revised on 10/30/09 and 3/19/10]

**52M.** Records shall be made available within 24 hours of a request by SRCAA or EPA to

document the monthly gasoline throughput at the facility. [40 CFR §63.11116(b), 1/10/08]

### III. PERMIT SHIELD

#### A. INAPPLICABLE REQUIREMENTS

The requirements listed in this section do not apply to the source, or to the specific emission units specified below, provided that such applicable requirements are included in and specifically identified in the permit. The permit shield applies to all requirements so identified. Citations to requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA. [WAC 173-401-640(2), 10/4/93]

**1PS.Registration.** SRCAA Regulation I, Article IV requires that certain air contaminant sources register with SRCAA. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [SRCAA Regulation I, Section 4.01 & 4.02, 3/4/04 - STATE/LOCAL ONLY]

**2PS. Registration.** WAC 173-400-100 requires certain air contaminant sources to register with the appropriate air pollution control authority. This registration requirement, while no longer a part of the state regulation, is in the State Implementation Plan and is still a federal requirement. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-100, 1/10/05]

**3PS. Standards for Control of Particulate Matter on Paved Surfaces: Emission Reduction and Control Plans and Sweeping Requirements.** SRCAA Regulation I, Sections 6.14.C and 6.14D establish requirements for governmental entities relating to the control of particulate matter on paved surfaces, including a requirement to develop and implement plans to reduce emissions and to clean priority roadways of sanding material. Because these sections apply only to governmental entities (and their contractors involved in cleaning roadways) and the permittee is neither a governmental entity nor their contractor involved in cleaning roadways, this rule does not apply. [SRCAA Regulation I, Section 6.14.C & 6.14.D, 10/7/04]

**4PS. Primary Aluminum Plants.** Chapter 173-415 WAC establishes requirements for primary aluminum plants. Primary aluminum plants are facilities at which aluminum metal is produced from aluminum oxide. Aluminum metal is not produced from aluminum oxide at this facility, so this regulation does not apply. [Chapter 173-415 WAC, 8/23/05]

**5PS. Solid Waste Incinerators.** Chapter 173-434 WAC establishes requirements for solid

waste incinerators. There are no solid waste incinerators at this facility, so this regulation does not apply. [Chapter 173-434 WAC, 12/22/03]

**6PS. VOC Controls in Ozone Nonattainment Areas.** Chapter 173-490 WAC establishes VOC control requirements for sources located in ozone nonattainment areas. This facility is not in an ozone nonattainment area, so this regulation does not apply. [Chapter 173-490 WAC, 2/2/98]

**7PS. Inapplicable Requirements for the 10 Melters, Designated as RM-M1, RM-M2E, RM-M2W, RM-M3, RM-M4, RM-M5, RM-M6, RM-M7, RM-M8E, & RM-M8W in This Permit, and 8 Holders, Designated as RM-H1 through RM-H8 in This Permit.**

**a. Visible Emissions from 10 Melters and 8 Holders.** WAC 173-400-040(1) & SRCAA Regulation I, Section 6.02 establish visible emissions standards of 20% opacity that apply to all emission units or emission points unless otherwise exempted. WAC 173-400-040(1)(d) and SRCAA Regulation I, Section 6.02.4 allow approval of an alternate opacity limit, under certain circumstances. An alternate opacity limit has been established for the 10 melters (designated as RM-M1, RM-M2E, RM-M2W, RM-M3, RM-M4, RM-M5, RM-M6, RM-M7, RM-M8E, & RM-M8W in this permit) and 8 holders (designated as RM-H1 through RM-H8 in this permit), so the 20% standards in WAC 173-400-040(1) and SRCAA Regulation I, Section 6.02 do not apply to these emission units. [WAC 173-400-040(1), 8/15/01] [SRCAA Regulation I, Section 6.02, 3/4/04 – STATE/LOCAL ONLY]

**b. Monthly Reporting Requirements for 10 Melters and 8 Holders.** SRCAA Order #91-01 requires monthly reporting for the 10 melters (designated as RM-M1, RM-M2E, RM-M2W, RM-M3, RM-M4, RM-M5, RM-M6, RM-M7, RM-M8E, & RM-M8W in this permit) and 8 holders (designated as RM-H1 through RM-H8 in this permit), but states that the monthly reporting requirements terminate when the facility commences reporting permit deviations under the terms of an air operating permit issued to the facility. The permittee reports permit deviations under this permit, thereby terminating the monthly reporting requirement in Order #91-01, so this requirement no longer applies. NOTE: Other monthly reporting requirements have been established in NOC approvals and other SRCAA orders. These reporting requirements continue to apply and are included in this permit. [SRCAA Order #91-01, Condition 8, 12/12/91]

**c. EPA Consent Decree for 10 Melters and 8 Holders.** A Consent Decree was filed with the US District Court on January 17, 1996. The Consent Decree established requirements for the 10 melters (designated as RM-M1, RM-M2E, RM-M2W, RM-M3, RM-M4, RM-M5, RM-M6, RM-M7, RM-M8E, & RM-M8W in this permit) and 8 holders (designated as RM-H1 through RM-H8 in this permit). The terms of the Consent Decree remained in effect until three conditions were fulfilled by the permittee. After the three conditions were met and the permittee certified to the Court and EPA that the conditions were met, the Consent Decree terminated and no longer applies to the facility. [Consent Decree approved by the US District Court, Eastern District of Washington, No. CS-95-0468-JLQ, Filed 1-17-96]

**8PS. Inapplicable Requirements for the Boilers, Designated as UT-B1 Through UT-B3 of**

**This Permit.**

**a. Standards of Performance for Fossil-Fuel Fired Steam Generators.** 40 CFR Part 60, Subpart D establishes standards for fossil-fuel fired steam generators. This rule applies to units with heat input rates of greater than 250 MMBTU per hour. The three boilers at the facility, designated as UT-1 through UT-3 in this permit, have heat input ratings of less than 100 MMBTU per hour (they are each 60 MMBTU per hour), so this rule does not apply. [40 CFR Part 60, Subpart D, 1999]

**b. Standards of Performance for Electric Utility Steam Generating Units.** 40 CFR Part 60, Subpart Da establishes standards for electric utility steam generating units. The three boilers at the facility, designated as UT-1 through UT-3 in this permit, are not electric utility steam generating units, as defined in this subpart, so this rule does not apply. [40 CFR Part 60, Subpart Da, 1999]

**c. Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.** 40 CFR Part 60, Subpart Db establishes standards for industrial, commercial, and institutional steam generating units. This rule applies to units with heat input rates of greater than 100 MMBTU per hour. The three boilers at the facility, designated as UT-1 through UT-3 in this permit, have heat input ratings of less than 100 MMBTU per hour, so this rule does not apply. [40 CFR Part 60, Subpart Db, 1999]

**d. Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** 40 CFR Part 60, Subpart Dc establishes standards for small industrial, commercial, and institutional steam generating units. This rule applies to units with heat input rates of 10 MMBTU per hour or greater but less than or equal to 100 MMBTU per hour for which construction, reconstruction or modification commenced after June 9, 1989. The three boilers at the facility, designated as UT-1 through UT-3 in this permit, were installed prior to June 9, 1989 and have not been reconstructed or modified since June 9, 1989, so this rule does not apply. [40 CFR Part 60, Subpart Dc, 1999]

**e. Continuous Monitoring and Recording.** WAC 173-400-105(5) establishes continuous monitoring and recording requirements for specific categories of sources. One of the categories is fossil-fuel fired steam generators. However, within this category, there are no monitoring and recording requirements for units with heat input ratings of less than 250 MMBTU per hour. The three boilers at the facility, designated as UT-1 through UT-3 in this permit, have heat input ratings of less than 100 MMBTU per hour, so this rule does not apply. [WAC 173-400-105(5)(a), 5/8/07(8/20/93)\* - see note on page 5]

**9PS. Inapplicable Requirements for the Inert Annealing Furnaces, Designated as CM-1 in This Permit.**

**a. Order to Comply with SRCAA Regulation I, Section 6.02 and Article V.** SRCAA issued an Order to Comply with SRCAA Regulation I, Section 6.02 on 5/23/94 for the inert annealing furnaces at KAFP (designated as CM-1 in this permit). The terms of the Order remained in effect until three actions were fulfilled by the permittee. The three actions have been met, so SRCAA Order 93-04 no longer applies to the facility.

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[SRCAA Order 93-04, 5/23/94]