NOTICE OF CONSTRUCTION (NOC):  #1598

DATE APPROVED:  (DRAFT)

COMPANY NAME:  KAISER ALUMINUM WASHINGTON, LLC
                15000 E. EUCLID
                P.O. BOX 15108
                SPOKANE VALLEY, WA  99215

FACILITY LOCATION:  KAISER ALUMINUM – TRENTWOOD WORKS
                    15000 E. EUCLID
                    SPOKANE VALLEY, WA  99215

DESCRIPTION OF EQUIPMENT BEING INSTALLED:

DC-0 CASTING COMPLEX:

- NATURAL GAS FIRED MELTING FURNACE WITH BLOOM #1150-200 REGENERATIVE BURNERS, RATED AT 52 MMBTU/HR ROUTED TO NEW MIKROPUL BAGHOUSE (24,120 DSCFM)

- NATURAL GAS FIRED HOLDING FURNACE WITH BLOOM #160-080X HIGH VELOCITY BURNERS, RATED AT 16 MMBTU/HR ROUTED TO EXISTING HOLDER BAGHOUSE; AND

- TWO CERAMIC FOAM FILTER HEATERS RATED AT 0.7 MMBTU/HR EACH AND TWO SPINNING-NOZZLE INERT GAS FLOTATION (SNIF) UNITS.

PREPARED BY: ________________________________  
April L. Westby

REVIEWED BY: ________________________________  
Joe Southwell, PE

APPROVED BY: ________________________________  
William Dameworth, Control Officer
PRELIMINARY DETERMINATION

A preliminary determination has been made, based on review of the Notice of Construction and Application for Approval (NOC) #1598. The proposed project, if constructed and operated as described in the NOC will be in compliance with the applicable rules and regulations, as adopted pursuant to Chapter 70.94 RCW, including Chapters 173-400 WAC, 173-460 WAC, and SRCAA Regulation I, provided that the following conditions are met:

Initial start-up requirements:

1. When the Washington Department of Ecology (Ecology) issues a Prevention of Significant Deterioration (PSD) applicability determination on the DC-0 casting complex (i.e., melter furnace, holder furnace, CFF Heaters, and SNIFs) project covered under this NOC (#1598), SRCAA reserves the right to re-open and revise the conditions of approval of this NOC to incorporate limits and/or requirements contained in the PSD applicability determination.

2. SRCAA shall be notified at least one week prior to the anticipated start-up date of the new DC-0 casting complex (i.e., melter furnace, holder furnace, CFF Heaters, and SNIFs)

3. This order of approval shall become invalid if:
   a. Construction is not commenced within eighteen months after the receipt of the approval, or
   b. Construction is discontinued for a period of eighteen months or more, or
   c. Construction is not completed within eighteen months of commencement.

SRCAA may extend any of the eighteen month periods referenced above, provided the proponent demonstrates that an extension is justified and the criteria given in SRCAA Regulation I, Section 5.13.B are met.

4. No later than 30 days after startup of the DC-0 melter complex, Kaiser shall submit a Compliance Assurance Monitoring (CAM) plan that meets the requirements of 40 CFR Part 64 to SRCAA for the holder baghouse. The CAM plan will be incorporated into the Air Operating Permit for Kaiser when it is renewed.

Emission Limits:

5. The emissions from the DC-0 melter furnace exhaust shall not exceed the following limits, as determined by averaging the results from three test runs, each conducted over the DC-0 melter furnace operating cycle when combustion occurs (period when burners are turned on, lid on, until metal charge has melted and “flat bath” conditions reached).

   Oxides of nitrogen (NOx): 0.097 lb / MMBTU
   Carbon monoxide (CO): 0.44 lb / MMBTU

6. The emissions from the DC-0 holder furnace exhaust shall not exceed the following limits, as determined by averaging the results from three test runs, each conducted over the DC-0 holder furnace operating cycle (period between initial charging and transfer of aluminum to casting pit).

   Oxides of nitrogen (NOx): 0.112 lb / MMBTU
   Carbon monoxide (CO): 0.379 lb / MMBTU
7. Except during periods of startup, shutdown, or malfunction, or as otherwise specified in 40 CFR 63, Subpart RRR, D/F emissions from the DC-0 melter furnace exhaust shall not exceed $3.7 \times 10^{-5}$ gr of D/F TEQ per ton of feed/charge, averaged over the DC-0 melter furnace operating cycle (period between initial charging and transfer of aluminum to holder furnace).

8. Dioxins / Furans (D/F) emissions from the DC-0 holder furnace shall not exceed 0.016 grams during any calendar year.

9. The particulate emission concentration from the melter baghouse exhaust stack shall not exceed 0.005 grains per dry standard cubic foot of exhaust gas.

10. The particulate emission concentration from the holder baghouse exhaust stack shall not exceed 0.015 grains per dry standard cubic foot of exhaust gas.

11. The exhaust from the DC-0 melter furnace shall be sent to the melter baghouse at all times, except the by-pass stack may be used during breakdowns or contingencies approved by SRCAA. The average opacity from the DC-0 melter shall not exceed any of the following limits, as determined using a Continuous Opacity Monitor or EPA Method 9:

   a. 10% during any 6-minute average from the melter baghouse exhaust stack;
   b. 24% during any 60-minute average from the DC-0 melter bypass stack; and
   c. 40% during any 30-minute average from the DC-0 melter bypass stack.

12. The exhaust from the DC-0 holder furnace shall be sent to the holder baghouse at all times, except the by-pass stack may be used during breakdowns or contingencies approved by SRCAA. The average opacity from the DC-0 holder shall not exceed any of the following limits, as determined using a Continuous Opacity Monitor or EPA Method 9:

   a. 10% during any 3-minute average from the holder baghouse exhaust stack;
   b. 24% during any 60-minute average from the DC-0 holder bypass stack; and
   c. 40% during any 30-minute average from the DC-0 holder bypass stack.

13. No reactive fluxing shall occur in the DC-0 melter or holder furnace, except for sodium scavenging additives (i.e., ProMag or other SRCAA approved flux). Controlled hydrogen chloride emissions from the sodium scavenging additives shall not exceed 0.008 pounds per ton of charge, as determined by averaging the results from three test runs, each conducted over the DC-0 melter or holder furnace operating cycle.

**Testing Requirements:**

14. Within 90 days after the new DC-0 melter furnace commences operation, an initial source test shall be performed on the melter furnace baghouse exhaust stack. 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. Prior to testing, the permittee shall submit a site-specific test plan to SRCAA for review and approval which satisfies all of the requirements given in 40 CFR §63.7(c). The
permittee shall provide notification to SRCAA and EPA prior to testing, as required by 40 CFR §63.9(e).

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 that Kaiser would like to operate the melter.

c. The source test shall consist of three separate test runs; pollutant sampling for each run must be conducted over the entire melter furnace operating cycle (period between initial charging and transfer of aluminum to holder furnace) for all pollutants except for oxides of nitrogen and carbon monoxide. For oxides of nitrogen and carbon monoxide, each run may be conducted over the melter furnace operating cycle when combustion occurs (period when burners are turned on, lid on, until metal charge has melted and “flat bath” conditions reached).

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 chlorine flux injection rate (ProMag addition rate).

f. During the test, the baghouse reagent injection rate shall be recorded during each of the three test runs.

g. The following constituents shall be measured during each test run:
   i. Volumetric flow rate and temperature, per EPA Methods 1 & 2;
   ii. Oxygen (O₂) & Carbon Dioxide (CO₂), per EPA Method 3A;
   iii. Moisture content, per EPA Method 4;
   iv. Oxides of Nitrogen (NOx), per EPA Method 7E;
   v. Carbon Monoxide (CO), per EPA Method 10;
   vi. Volatile Organic Compounds (VOC), per EPA Method 25A;
   vii. Sulfur Dioxide (SO₂), per EPA Method 6C;
   viii. Particulate matter, per EPA Methods 5 and 202;
   ix. Hydrogen chloride, per EPA Method 26A; and
   x. Dioxin / Furan, per EPA Method 23.

f. 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 chlorine flux injection rate (ProMag addition rate), established during the test, per §63.1512(o).

15. Within 90 days after the new DC-0 holder furnace commences operation, an initial source test shall be performed on the DC-0 holder furnace. 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 SRCAA for review and approval.
b. During the test, the holder shall be operated at the unit’s highest production level and at
the highest reactive fluxing rate that Kaiser would like to operate the holder.

c. The source test shall consist of three separate test runs; pollutant sampling for each run
must be conducted over the entire holder furnace operating cycle (period between initial
charging and transfer of aluminum to casting pit).

d. During the test, the permittee shall measure and record the total weight of feed/charge to
the holder for each of the three test runs and calculate and record the total weight.

e. During the test, the permittee shall record the total reactive flux usage (ProMag addition
rate) for each of the three test runs.

f. During the test, the baghouse reagent injection rate shall be recorded during each of the
three test runs.

g. The following constituents shall be measured during each test run:
   i. Volumetric flow rate and temperature, per EPA Methods 1 & 2;
   ii. Oxygen (O₂) & Carbon Dioxide (CO₂), per EPA Method 3A;
   iii. Moisture content, per EPA Method 4;
   iv. Oxides of Nitrogen (NOx), per EPA Method 7E;
   v. Carbon Monoxide (CO), per EPA Method 10;
   vi. Volatile Organic Compounds (VOC), per EPA Method 25A;
   vii. Sulfur Dioxide (SO₂), per EPA Method 6C;
   viii. Particulate matter, per EPA Methods 5 and 202;
   ix. Hydrogen chloride, per EPA Method 26A; and
   x. Dioxin / Furan, per EPA Method 23.

h. A report, detailing the source test results, shall be submitted to SRCAA for approval no
later than 60 days after the test is performed.

16. After the initial source test, a source test must be conducted on the DC-0 melter furnace
baghouse and DC-0 holder furnace at least once each calendar year. 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 Agency for review and approval.

b. During each test, the melter and holder 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.

c. Each source test shall consist of three separate test runs; pollutant sampling for each
run must be conducted over the entire melter furnace operating cycle when combustion
occurs (period from furnace lid on with burners on to flat bath when melting is complete)
and holder furnace operating cycle (period between initial charging and transfer of
aluminum to casting pit).
d. During each test, the permittee shall measure and record the total weight of feed/charge to the melter and holder for each of the three test runs and calculate and record the total weight.

e. The following constituents shall be measured at least once each calendar year, unless SRCAA approves an alternate test frequency:
   i. Volumetric flow rate and temperature, per EPA Methods 1 & 2;
   ii. Oxygen (O₂) & Carbon Dioxide (CO₂), per EPA Method 3A;
   iii. Moisture content, per EPA Method 4;
   iv. Oxides of Nitrogen (NOx), 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:
   i. Volatile Organic Compounds (VOC), per EPA Method 25A;
   ii. Sulfur Dioxide (SO₂), 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.

**Monitoring Requirements:**

17. The opacity from the melter baghouse exhaust stack shall be monitored continuously, using a continuous opacity monitor (COM) and data processing and recording equipment, meeting the requirements of 40 CFR 60.13 (1995) and 40 CFR 60, Appendix B (1995). The COM installed on the melter baghouse stack shall meet EPA Performance Specification 1, 40 CFR Part 60, Appendix B (1995) and shall be operated in accordance with 40 CFR §60.13 (1995), including the operation requirements in 40 CFR §60.13(e). The COM shall be operated in accordance with the quality assurance plan (QAP) for the COM approved by SRCAA. All COM records shall be kept for 5 years and made available to SRCAA personnel upon request.

Daily checks shall be performed on the COM in accordance with 40 CFR §60.13. In addition, the COM shall be audited at least every quarter and maintain a calibration error of 3% or less, per 40 CFR Part 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 and/or annual audit when the COM will be off-line (i.e., “in maintenance mode”). Results of each daily check and quarterly audit of the COM shall be kept for 5 years and made available to SRCAA personnel upon request.

18. The opacity from the holder baghouse exhaust stack shall be monitored continuously, using a continuous opacity monitor (COM) and data processing and recording equipment, meeting the requirements of 40 CFR 60.13 (1995) and 40 CFR 60, Appendix B (1995). The COM installed on the holder baghouse stack shall meet EPA Performance Specification 1, 40 CFR Part 60, Appendix B (1995) and shall be operated in accordance with 40 CFR §60.13 (1995), including the operation requirements in 40 CFR §60.13(e), with the following exception: each 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. The COM shall be operated in accordance with the quality assurance plan (QAP) for the COM approved by SRCAA. All COM records shall be kept for 5 years and made available to SRCAA personnel upon request.
Daily checks shall be performed on the COM in accordance with 40 CFR §60.13. In addition, the COM shall be audited at least every quarter and maintain a calibration error of 3% or less, per 40 CFR Part 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 and/or annual audit when the COM will be off-line (i.e., “in maintenance mode”). Results of each daily check and quarterly audit of the COM shall be kept for 5 years and made available to SRCAA personnel upon request.

19. 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 25.

      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 grain loading emission limit, perform, or have performed, EPA Method 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 EPA Method 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.

      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 EPA Method 5 tests, and a description of any corrective action taken.

20. The permittee shall install, calibrate, operate, and maintain a device to measure and record or otherwise determine the weight of feed/charge (or throughput) for each DC-0 melter furnace operating cycle in accordance with 40 CFR §63.1506(d). 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, as stipulated in 40 CFR §63.1510(e). 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.

21. The DC-0 melter furnace shall be operated with a total reactive flux injection rate (ProMag addition rate) at or below the level established during the initial source test, required in Condition 14. 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 the DC-0 melter 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 initial source 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 (e.g., Pro-Mag)

b. The accuracy of the weight measurement device must be ±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 ±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 SRCAA 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.

Operational Requirements:

22. Anytime the by-pass stack(s) associated with the holder furnaces dry scrubbing/baghouse system or melter furnace baghouse 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 holder or melter baghouse has been bypassed, Kaiser shall implement the SRCAA approved BAGHOUSE BREAKDOWN / BYPASS PROCEDURE contained in the approved O&M plan to minimize visible emissions from the melter(s) and/or holders.

All by-passes shall be reported on the monthly report required in Condition 31. The monthly report shall describe the time and duration of the by-pass and the circumstances that made the by-pass necessary.

23. Sodium bicarbonate or Trona shall be used as reagent for acid gas removal in the melter furnace baghouse and holder dry scrubbing baghouse, unless otherwise approved by

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SRCAA. The reagent injection rate in the melter baghouse shall be monitored and kept at a rate at or above the injection rate established during the initial source test as described in Condition 14, or a SRCAA approved alternate SRCAA injection rate. The reagent injection rate in the holder baghouse shall be monitored and kept at a rate to ensure the reagent availability ratio is greater than or equal to 1.1, per the equations given in NOCs #676 & #683, or a SRCAA approved alternate injection rate.

24. Only clean charge, as described in the operation and maintenance plan for the remelt area, as described in Condition 25, shall be melted in DC-0 melter furnace. It should be noted that the definition of “clean charge” under the O&M plan does not meet the more stringent definition of “clean charge” under 40 CFR Part 63, Subpart RRR.

25. At all times, including startup, shutdown, and malfunction, the DC-0 melter and melter baghouse and DC-0 holder and holder baghouse shall be maintained and operated in a manner consistent with good air pollution control practices. At a minimum, the following requirements must be met:

a. The permittee shall follow the operation and maintenance (O&M) plan for the remelt area, dated February 25, 2013, or a SRCAA approved revision. The plan shall be updated within 90 days after the new DC-0 melter complex and melter baghouse commence operation to incorporate the new DC-0 melter complex and melter baghouse. In addition, the plan shall be updated at least every two years and submitted to SRCAA for review and approval. At a minimum, the O&M plan shall address the following for the new DC-0 melter complex and melter baghouse:

   i. Procedures for startup, shutdown, and malfunction of the DC-0 melter and holder;
   ii. Description of acceptable materials to be charged in the melter (definition of materials that are considered clean charge);
   iii. Procedures for charging and skimming melter;
   iv. Procedures for handling and processing scrap material;
   v. 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;
   vi. Routine maintenance activities for the new melter baghouse and existing holder baghouse required to keep the control systems in proper operating condition, including manufacturer recommended operation and maintenance procedures;
   vii. Baghouse Breakdown / Bypass Procedure for the melter baghouse and holder baghouse; and
   viii. A quality assurance / quality control plan for the continuous opacity monitor system on the melter baghouse and holder baghouse systems.

b. The permittee shall operate the DC-0 melter furnace in accordance with the measures documented in the written operation, maintenance, and monitoring (OM&M) plan and within the parameter values or ranges established in the OM&M plan, as required per 40 CFR 63, Subpart RRR. If a process parameter deviates from the value or range established in the OM&M plan, corrective action must be taken in accordance with 40 CFR §63.1506(p).
The permittee shall comply with all of the provisions of the OM&M plan as submitted to SRCAA (i.e., plan dated May 14, 2013), unless and until the plan is revised in accordance with the following procedures. The OM&M plan shall be updated within 90 days after the new DC-0 melter furnace commences operation to incorporate the new DC-0 melter furnace. 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 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 OM&M plan must contain the following information:

i. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for the melter;

ii. A monitoring schedule for the melter;

iii. Procedures for the operation and maintenance of the melter, necessary to meet the applicable emission limits in 40 CFR §63.1505;

iv. Procedures for the operation and maintenance of monitoring devices or systems, necessary to determine compliance, including:
   A. Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer’s instructions; and
   B. 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.

v. 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;

vi. Corrective actions to be taken when process or operating parameters deviate from the established value or range, including:
   A. Procedures to determine and record the cause of a deviation or excursion, and time and date the deviation or excursion began and ended; and
   B. Procedures for recording the corrective action taken, the time and date corrective action was initiated, and the time and date corrective action was completed.

vii. A maintenance schedule for the melter that is consistent with the manufacturer’s instructions and recommendations for routine and long-term maintenance; and

viii. 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 melter. The site specific monitoring plan must address monitoring and compliance requirements for D/F from the melter. The permittee must comply with the site specific monitoring plan submitted to SRCAA, dated May 14, 2013, or a subsequent SRCAA approved revision. 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. The site-specific monitoring plan must meet the following requirements:

A. The plan must document each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards;

B. 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);

C. 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.

D. 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:
   1. A proven method for collecting representative samples and measuring the oil and coatings content of scrap samples;
   2. A scrap inspector training program;
   3. An established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
   4. Periodic physical measurements of oil and coatings content of randomly selected scrap samples and comparison with visual inspection results;
   5. A system for assuring that only acceptable scrap is charged to the melters; and
   6. Recordkeeping requirements to document conformance with plan requirements.

c. The permittee shall follow the written plan, dated May 14, 2013, or a subsequent SRCAA approved revision that contains procedures to be followed for operating and maintaining the melter 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 plan shall be updated within 90 days after the new DC-0 melter furnace commences operation to incorporate the new DC-0 melter furnace. Malfunctions shall be corrected as soon as practicable in accordance with the startup, shutdown, and malfunction plan. 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:
   i. Procedures to determine and record the cause of the malfunction and the time and date the malfunction began and ended; and
   ii. 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.

d. Maintenance records shall be kept which document that the DC-0 melter, DC-0 holder, melter baghouse, and holder baghouse are kept in proper operating condition. Compliance with this requirement may be achieved by implementing a computerized
preventative maintenance system that regularly schedules and tracks maintenance activities. Records shall be kept for 5 years and made available to SRCAA personnel upon request.

26. The DC-0 melter furnace shall be labeled, including identification of the type of emission unit and the applicable operational standards and control standards applicable under 40 CFR 63, Subpart RRR. The permittee shall inspect the labels for DC-0 melter furnace at least once per calendar month to confirm that posted labels, as required by 40 CFR §63.1506(b), are intact and legible. Records shall be kept of monthly inspections for 5 years and made available to SRCAA personnel upon request.

27. No more than 71,750 tons of charge shall be melted in the DC-0 melter furnace during any consecutive twelve month period. No later than the 15th of each month, the amount of charge melted in DC-0 shall be totaled and recorded. If the amount of charge melted in the DC-0 furnace during any month exceeds 5,979 tons, the amount of charge melted in DC-0 during the previous consecutive twelve month period shall be totaled and recorded. Records shall be kept of the total amount of charge melted in DC-0 each month. All records shall be kept for 5 years and made available to SRCAA personnel upon request.

28. No more than 175.8 million standard cubic feet (scf) of natural gas (equivalent to 179,375 MMBtu) shall be burned in the DC-0 melter furnace during any consecutive 12 month period. No later than the 15th of each month, the amount of natural gas burned in the DC-0 melter furnace during the previous month shall be totaled and recorded. If the amount of natural gas burned in the DC-0 melter during any month exceeds 14.6 million scf, the amount of natural gas burned in the DC-0 melter during the previous consecutive twelve month period shall be totaled and recorded. All records shall be kept for 5 years and made available to SRCAA personnel upon request.

29. No more than 40.8 million standard cubic feet (scf) of natural gas (equivalent to 41,615 MMBtu) shall be burned in the DC-0 holder furnace during any consecutive 12 month period. No later than the 15th of each month, the amount of natural gas burned in the DC-0 holder furnace during the previous month shall be totaled and recorded. If the amount of natural gas burned in the DC-0 holder during any month exceeds 3.4 million scf, the amount of natural gas burned in the DC-0 holder during the previous consecutive twelve month period shall be totaled and recorded. All records shall be kept for 5 years and made available to SRCAA personnel upon request.

**Recordkeeping Requirements:**

30. The permittee shall maintain files of all information (including all reports and notifications) required by 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 for five years:

   a. For each continuous monitoring system, records required by 40 CFR 63.10(c);
   b. Records of feed/charge (or throughput) weights for each operating cycle or time period used in the all source tests;
   c. Records of daily COM checks and audits (described in Conditions 17 & 18);
d. Records of flux usage (described in Condition 21);

e. Approved site-specific monitoring plan with records documenting conformance with the plan (described in Condition 25.b.viii);

f. Records for monthly inspections for proper unit labeling for the melter (described in Condition 26);

g. Records of any approved alternative monitoring or test procedure;

h. 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;

i. Maintenance records for DC-0 melter and holder and baghouses (described in Condition 25.d.);

j. Monthly charge records (described in Condition 27); and

k. Monthly natural gas usage records (described in Conditions 28 & 29);

**Reporting Requirements:**

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

   a. A report of the excess emissions documented by the dry scrubbing/baghouse system and melter 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.

   b. A report of any 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.

   c. The time, duration, and circumstances of each by-pass of the dry scrubbing/baghouse system and/or the melter baghouse system that occurred during the month covered by the report.

   The reports must be submitted by the 25th of each month following the reporting month.

32. 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 (described in Condition 25.c.), 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 semi-annual monitoring reports, due by July 30th (covering first half of calendar year) and April 15th (covering 2nd half of calendar year) each year.

33. Any time an action taken by the permittee during a startup or shutdown that caused the source to exceed any applicable emission limitation given in 40 CFR 63, Subpart RRR, 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 (described in Condition 25.c.), 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).

34. The permittee shall submit a notification of compliance status report addressing the new DC-0 melter furnace to EPA Region X and SRCAA no later than 90 days after the initial performance test on DC-0 is performed. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (a)(1) through (10) of 40 CFR §63.1515(b).

General Requirements:

35. A copy of the Notice of Construction and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request.

36. The requirements from SRCAA Order #03-01, issued on March 3, 2003 apply to the new DC-0 melter and DC-0 holder furnaces.

37. The Control Officer, or duly authorized representative, shall be allowed to enter the facility premises at reasonable times to inspect equipment and/or records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with SRCAA Regulation I, Article II and RCW 70.94.200. For the purposes of this NOC approval, reasonable time include, but are not limited to, any of the following: normal business and/or equipment operating hours, periods of equipment breakdown or malfunction, and times when the Control Officer, or duly authorized representative are investigating air quality complaints filed with the agency and/or have reason to
believe that air quality violations have occurred or may be occurring. No person shall obstruct, hamper or interfere with any such inspection.

**General Information**

This Notice of Construction approval is specific to the present location (15000 E. Euclid Ave., Spokane Valley, WA) and is not transferable to a new location. If the equipment is moved from this site to a new site, a new Notice of Construction is required.

It should be noted that the approval of this Notice of Construction does not relieve the proponent of the obligation to comply with all other applicable federal, state and local regulations and requirements.

This order of approval may be modified, suspended or revoked in whole or in part for just cause including, but not limited to, the following:

1. Violation of any terms or conditions of this order of approval.
2. Obtaining this order of approval by misrepresentation or failure to disclose fully all relevant facts.

This order of approval may be appealed as described below:

Pursuant to the Revised Code of Washington (RCW) 43.21B.310, you have the right to appeal this Order by filing a notice of appeal with both the Pollution Control Hearings Board (PCHB) and the Spokane Regional Clean Air Agency (SRCAA) on or before the 30th day of receipt of SRCAA’s order, permit, license, Notice and Order of Assessment of Civil Penalty, or Notice of Disposition.

Required procedures are detailed in state law (Chapter 43.21B RCW and Chapter 70.94 RCW) and the PCHB’s own regulations (Chapter 371.08 Washington Administrative Code) which may be found in many public libraries, county and municipal law libraries or on the Internet at www.access.wa.gov/. Since others publish these documents, copies are not available from SRCAA.

If you are filing an appeal, mail it to SRCAA and the PCHB at the following addresses:

SRCAA & PCHB
1101 W. College, Suite 403 Environmental Hearings Office
Spokane, WA 99201 4224 - 6th Avenue SE, Rowe Six, Bldg. 2
P.O. Box 40903 P.O. Box 40903
Lacey, WA 98504-0903