OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

OREGON TITLE V OPERATING PERMIT

Eastern Region

475 NE Bellevue Dr., Suite 110

Bend, OR 97701

Telephone (541) 388-6146

Issued in accordance with the provisions of ORS 468A.040

and based on the land use compatibility findings included in the permit record.

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| --- | --- | --- |
| ISSUED TO: | INFORMATION RELIED UPON: | |
|  |  |  |
| Northwest Aluminum Specialties, Inc. | Application Number: | 23705 |
| 2929 West Second Street | Received: | 06/03/09 |
| The Dalles, OR 97058 |  |  |
|  |  |  |
| PLANT SITE LOCATION: | LAND USE COMPATIBILITY STATEMENT: | |
|  |  |  |
| 2929 West Second Street  The Dalles, OR 97058 | Issued by: | City of The Dalles and Wasco County |
|  | Dated: | 12/07/89 and 08/30/94 |

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| --- | --- | --- |
| ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY | | |
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| \_\_\_\_ (*Signed by Lawrence Charles Calkins)* \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_ *(Issued 10/12/2010)* \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| Charles Lawrence Calkins, Acting Air Quality Manager,  Eastern Region | Date |  |

|  |  |  |
| --- | --- | --- |
| Nature of Business | SIC | NAICS |
| Secondary Metals [Aluminum] Smelting and Refining | 3341 | 331314 |

RESPONSIBLE OFFICIAL FACILITY CONTACT PERSON

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | Bill Reid | Name: | Tom Wasson |
| Title: | CEO | Title: | Chemist |
| or |  | Phone: | (541) 298-0835 |
| Name: | James Shaver |  |  |
| Title: | NWAS Operations Manager |  |  |

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP Air Contaminant Discharge Permit

Act Federal Clean Air Act

ASTM American Society of Testing and Materials

Btu British thermal unit

CFR Code of Federal Regulations

CO Carbon Monoxide

CPMS Continuous Parameter Monitoring System

DEQ Department of Environmental Quality

dscf Dry standard cubic feet

EF Emission Factor

EPA US Environmental Protection Agency

EU Emissions Unit

FCAA Federal Clean Air Act

FSA Fuel Sampling and Analysis

gr/dscf Grain per dry standard cubic feet

(1 pound = 7000 grains)

HAP Hazardous Air Pollutant as defined by OAR 340-244-0040

HCFC Halogenated Chloro-Fluoro-Carbons

ID Identification Number or Label

I&M Inspection and Maintenance

NA Not Applicable

NOx Nitrogen Oxides

O2 Oxygen

OAR Oregon Administrative Rules

ODEQ Oregon Department of Environmental Quality

ORS Oregon Revised Statutes

O&M Operation and Maintenance

Pb Lead

PCD Pollution Control Device

PM Particulate Matter

PM10 Particulate Matter less than 10 microns in size

ppm Parts per million

PSEL Plant Site Emission Limit

psia pounds per square inch, actual

SERP Source Emissions Reduction Plan

SO2 Sulfur Dioxide

ST Source Test

VE Visible Emissions

VMT Vehicle Miles Traveled

VOC Volatile Organic Compounds

**Modified EPA Method 9:** As used in this permit “Modified EPA Method 9” is defined as follows:

Opacity must be measured in accordance with EPA Method 9. For all standards, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See also the definition of “Opacity” in OAR 340-208-0010]

PERMITTED ACTIVITIES

# Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]

# All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA and citizens under the Clean Air Act, except as specified below:

## Conditions 6, 7, 39, G5 and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [OAR 340-218-0060]

## Attachment 1 of this permit provides a cross-reference for SIP and Title V program rules that have been renumbered in the current Oregon Administrative Rules. [OAR 340-218-0060 and 340-218-0070]

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

# The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

| **Emission Unit Description** | **EU ID** | **Pollution Control Device/Practice Description** | **PCD ID** | **40 CFR Part 63 NESHAP Applicability** |
| --- | --- | --- | --- | --- |
| Casthouse Casting Tables | B-3c | None | NA | No |
| 1 R&D Induction Furnace | B-3b | None | NA | Subpart RRR  (Group 2 furnaces) |
| 2 Tilt Holding Furnaces with In-line Non-reactive Degassing Units | B-3c.1 and, B-3c.2 | See emissions unit B-4a | See emissions unit B-4a | Subpart RRR  (Group 1 furnaces) |
| 1 Horizontal Rotary Furnace  (future installation) | B-3c.3 | See emissions unit B-4a | See emissions unit B-4a | Subpart RRR (Group 1 furnace if non-clean charge, Group 2 furnace if clean charge) |
| 4 Homogenizing Furnaces | B-3d.1 through  B-3d.4 | Process control | NA | Subpart RRR  (Group 2 furnaces) |
| 4 Induction Furnaces | B-4a.1 through  B-4a.4 | 2 to 4 baghouses  (future installation) | B-4a.c1 through  B-4a.c4 | Subpart RRR  (Group 2 furnaces) |
| Dross Handling/Storage Building | B-6 | Work practices | NA | No |
| Aluminum Scrap Shredder | B-5 | None | NA | Subpart RRR |
| Roads | NA | None | NA | No |

## The permittee plans to install a horizontal rotary furnace (emissions unit B-3c.3) at the NWA Specialties facility. The new furnace will have a baghouse control device. The permittee must submit a notice of construction completion (form R1004) within 30 days after commencing operation of the furnace.

## The permittee plans to install baghouses on the 4 induction furnaces (emissions unit B-4a) at NWA Specialties. This will be a phased project that will include an initial study to evaluate effective baghouse systems. The final system will consist of 2 to 4 baghouses and also control emissions from the existing tilt holding furnaces (emissions units B-3c.1 and B-3c.2).

### The permittee must provide notice of the initial pilot plant source test to the Department at least 15 days before the test.

### The permittee must submit plans to the Department for the final proposed project and the plans must be approved in accordance with OAR 340-218-0190 before installing the final system.

EMISSION LIMITS AND STANDARDS

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

**Facility wide Requirements**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Applicable Requirement** | **Condition Number** | **Pollutant/Parameter** | **Limit/Standard** | **Monitoring Condition** |
| 340-208-0110(2) |  | Visible emissions | 20% opacity |  |
| 340-208-0210(2) |  | fugitive dust | Minimize fugitives |  |
| 340-208-0300 |  | Air contaminants | Not cause a nuisance |  |
| 340-208-0450 |  | PM >250μ | No observable deposition off site |  |
| 340-222-0040(6) |  | Fuels | Natural gas/propane only |  |
| 340-226-0210(1)(a) |  | PM/PM10 | 0.1 gr/dscf |  |
| 40 CFR part 68 |  | Risk management | Risk management plan |  |
| 40 CFR part 63 general provisions |  | General conditions | See Attachment B and 40 CFR Part 63, subpart A | NA |

# The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units B-3c and B-3d, and all fugitive emission sources for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, as measured in accordance with Condition . [OAR 340-208-0110(2)(b)]

# The permittee shall not allow or permit any materials to be handled, transported or stored; or a building, its appurtenances or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to storing collected material from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer. [OAR 340-208-0210(2)]

# The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel. [OAR 340-208-0300] This condition is enforceable only by the State.

# The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [OAR 340-208-0450] This condition is enforceable only by the State.

# The permittee shall not use any residual fuel oil, distillate fuel oil or coal. [OAR 340-222-0040(6)]

# The permittee shall not cause or allow the emission of particulate matter from emissions units B-3b, B-3c, B-3d, and B-4a in excess of 0.1 grain per dry standard cubic foot, as measured in accordance with Condition 24 for emissions units B-3c.1, B-3c.2, and B-3c.3; and Condition for emissions unit B-3b, B-3d, and B-4a. [OAR 340-226-0210(1)(b)]

# Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

# This facility is subject to 40 CFR part 63, subpart RRR (secondary aluminum production NESHAP). The specific requirements from the regulation are included in this permit in the appropriate sections or listed in the non-applicable section of this permit. Unless otherwise stated in this permit or the applicable requirements, the general provisions from subpart A of part 63 are applicable and incorporated by reference as shown in Attachment B. [40 CFR §63.1518]

**Secondary Aluminum NESHAP**

# The permittee must comply with the following applicable requirements for affected sources and emissions units subject to subpart RRR. [40 CFR §63.1505(a)]

## Aluminum scrap shredder: Particulate matter emissions from the aluminum scrap shredder (emissions unit B-5) must not exceed 0.010 gr/dscf. [40 CFR §63.1505(b)(1)]

## Group 1 furnaces: The following limits apply to Group 1 furnaces for purposes of determining the emission standards for SAPUs:

### Particulate matter (PM)/non-clean charge: 0.40 pound per ton of feed/charge; [40 CFR §63.1505(i)(1)]

### Particulate matter (PM)/clean charge: 0.80 pound per ton of feed/charge; [40 CFR §63.1505(i)(2)]

### Dioxin/furan (D/F TEQ)/non-clean charge: 2.1x 10-4 grains of D/F TEQ per ton of feed/charge); [40 CFR 63.1505(i)(3)

### Hydrogen chloride (HCl): 0.40 pound per ton of feed/charge; [40 CFR §63.1505(i)(4)]

### The permittee may determine the emissions standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of the feed/charge. [40 CFR §63.1505(i)(6)]

## In-line fluxer: Visible emissions from the in-line fluxer (emissions unit B-3c.1, B-3c.2, and B-3c.3) must not exceed 10% opacity if an add-on control device is used to control PM emissions and a COM is chosen as the monitoring option. [40 CFR §63.1505(j)(4)]

## Secondary aluminum processing unit (SAPU): The emissions standards for SAPU are determined as follows:

### Particulate matter (PM): The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of: [40 CFR §63.1505(k)(1)]



Where,

LtiPM = The PM emission limit for individual emission unit i in Condition 12.b.i or 12.b.ii for a group 1 furnace;

Tti = The feed/charge rate for individual emission unit i; and

LcPM = The PM emission limit for the secondary aluminum processing unit.

**Note:** In-line fluxers using no reactive flux materials cannot be included in this calculation since they are not subject to the PM limit.

### Hydrogen chloride (HCl): The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of HCl in excess of: [40 CFR §63.1505(k)(2)]



Where,

LtiHCl = The HCl emission limit for individual emission unit i in Condition 12.b.iv for a group 1 furnace;

Tti = The feed/charge rate for individual emission unit i; and

LcHCl = The HCl emission limit for the secondary aluminum processing unit.

**Note:** In-line fluxers using no reactive flux materials cannot be included in this calculation since they are not subject to the HCl limit.

### Dioxin/furan (D/F): The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of: [40 CFR §63.1505(k)(3)]



Where,

LtiD/F = The D/F emission limit for individual emission unit i in Condition 12.b.iii for a group 1 furnace

Tti = The feed/charge rate for individual emission unit i; and

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

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

### The permittee may demonstrate compliance with emission limits of Conditions 12.d.i and 12.d.iii by demonstrating that each emission unit within the SAPU is in compliance with the applicable emission limits in Conditions 12.b.i and 12.b.iii. [40 CFR §63.1505(k)(4)]

# The permittee must operate all new and existing affected sources and control equipment according to the requirements listed below. The completion of the initial performance tests for SAPUs shall be considered the date of approval of the OM&M plan. [40 CFR §63.1506(a)(1) and (2)]

## Labeling: The permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace and in-line fluxer that identifies the applicable emission limits and means of compliance, including: [40 CFR §63.1506(b)]

### The type of affected source or emission unit (e.g., group 1 furnace, in-line fluxer or group 2 furnace).

### The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

## Capture/collection systems: For each affected source or emission unit equipped with an add-on air pollution control device (emissions units B-3c.1, B-3c.2, B-3c.3, B-4a.1, B-4a.2, B-4a.3, and B-4a.4), the permittee must: [40 CFR §63.1506(c)]

### Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Industrial Hygienists in chapters 3 and 5 of “Industrial Ventilation: A Manual of Recommended Practice” (incorporated by reference);

### Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

### Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

## Feed/charge weight: The permittee must: [40 CFR §63.1506(d)]

### Except as provided in Condition 13.c.iii, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and

### Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.

### The permittee may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit provided that:

#### The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and

#### All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.

## In-line fluxer using no reactive flux material: The permittee must operate each in-line fluxer using no reactive flux materials (emissions units B-3c.1, B-3c.2, and B-3c.3). [40 CFR §63.1506(l)]

## Group 1 furnaces without add-on air pollution control devices: For each group 1 furnace, including a group 1 furnace that is part of a SAPU, without add-on pollution control devices (emissions units B-3c.1, B-3c.2, and B-3c.3), the permittee must: [40 CFR §63.1506(n)]

### Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.

### Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.

### Operate each group 1 melting/holding furnace subject to the emission standards in Condition 12.b.ii using only clean charge as the feedstock.

## Group 2 furnaces: For each group 2 furnace (emission units A-3a.4, A-3b.1, B-3b, B-3c.1, B-3c.2, B-3c.3, B-3d.1, B-3d.2, B-3d.3, B-3d.4, B-4a.1, B-4a.2, B-4a.3, and B-4a.4), the permittee must: [40 CFR §63.1506(o)]

### Operate each furnace using only clean charge as the feedstock.

### Operate each furnace using no reactive flux.

## Corrective action: When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated into the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of the deviation.

**Insignificant Activities Emission Limits and Standards**

# The Department acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:

## OAR 340-208-0110 (20% opacity)

## OAR 340-226-0210 (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)

## OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)

## OAR 340-228-0210 (0.1 gr/dscf corrected to 12% CO2 or 50% excess air for fuel burning equipment)

Unless otherwise specified in this permit or an applicable requirement, the Department is not requiring any testing, monitoring, recordkeeping or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in OAR 340-208-0010 and perform the testing in accordance with the Department’s Source Sampling Manual.

PLANT SITE EMISSION LIMITS

# The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period as monitored in accordance with Condition 55: [OAR 340-222-0040 through OAR 340-222-0043]

|  |  |  |  |
| --- | --- | --- | --- |
| **Pollutant** | **Plant Site Emission Limit (tons/yr)** | **Unassigned Emissions (tons/yr)** | **Emission Reduction Credit (tons/yr)** |
| PM/PM10 | 14 | 407 | 0 |
| SO2 | 39 | 445 | 0 |
| NOx | 39 | 24 | 0 |
| CO | 99 | 15315 | 0 |
| VOC | 39 | 170 | 0 |
| Fluoride | 0 | 51 | 0 |

## The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by the Department.

## If not used by 07/01/15, the unassigned emissions will be reduced to the SER. [OAR 340-222-0045]

EMISSION FEES

# The Plant Site Emission Limits specified in Condition 15 are equal to the Generic PSELs defined in OAR 340-200-0020. Potential emissions for this source are much less than the Generic PSELs. The **permitted emissions** for purposes of paying fees are provided in the following table. [OAR 340-220-0090]

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Emission Source Description** | **Permitted Process Code [DEQ codes]** | **PM10 (tons)** | **SO2 (tons)** | **NOX (tons)** | **VOC (tons)** |
| Furnaces | GS-1/P-1 | 0.8 | 0.3 | 10.9 | 0.6 |
| Castehouse | GS-2/P-1 | 2.6 | 0 | 0 | 0 |
| Fugitives | FS-1/P-1 | 1.9 | 1 | 1 | 1.7 |

NESHAP COMPLIANCE PROVISIONS

# At all times, including periods of startup, shutdown and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. [40 CFR §63.6(e)(1)]

## Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown and malfunction plan required in Condition 19.

## Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

# Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown and malfunction plan required in Condition 19), review of operation and maintenance records and inspection of the source. [40 CFR §63.6(e)(2)]

# Startup, shutdown and malfunction plan: The permittee shall develop and implement a written plan as described in 40 CFR §63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the standard. [40 CFR §63.6(e)(3) and §63.1516(a)]

## This plan shall be developed by the permittee by the source's compliance date for the relevant standards. The purpose of the startup, shutdown and malfunction plan is to:

### Ensure that, at all times, the permittee operates and maintains affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards;

### Ensure that the permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and

### Reduce the reporting burden associated with periods of startup, shutdown and malfunction, including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation.

## During periods of startup, shutdown and malfunction, the permittee shall operate and maintain the affected source(s) (including associated air pollution control equipment) in accordance with the procedures specified in the startup, shutdown and malfunction plan developed under Condition 19.a. [40 CFR §63.6(e)(3)(ii)]

## When actions taken by the permittee during a startup, shutdown or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's startup, shutdown and malfunction plan, the permittee shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the startup, shutdown and malfunction plan for that event. In addition, the permittee shall keep records of these events as specified in Condition 61 (and elsewhere in 40 CFR part 63), including records of the occurrence and duration of each startup, shutdown or malfunction of operation and each malfunction of the air pollution control equipment. Furthermore, the permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown and malfunction report required in Condition 75. [40 CFR §63.6(e)(3)(iii)]

## If an action taken by the permittee during a startup, shutdown or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown and malfunction plan, the permittee shall record the actions taken for that event and shall report such actions 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, in accordance with Condition 75.a (unless the permittee makes alternative reporting arrangements, in advance, with the Administrator). [40 CFR §63.6(e)(3)(iv)]

## The permittee shall keep the written startup, shutdown and malfunction plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR part 63. In addition, if the startup, shutdown and malfunction plan is revised, the permittee shall keep previous (i.e., superseded) versions of the startup, shutdown and malfunction plan on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan. [40 CFR §63.6(e)(3)(v)]

## To satisfy the requirements of this section to develop a startup, shutdown and malfunction plan, the permittee may use the affected source's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by the Administrator. [40 CFR §63.6(e)(3)(vi)]

## Based on the results of a determination made under Condition 18, the Administrator may require that the permittee make changes to the startup, shutdown and malfunction plan for that source. The Administrator may require reasonable revisions to a startup, shutdown and malfunction plan, if the Administrator finds that the plan: [40 CFR §63.6(e)(3)(vii)]

### Does not address a startup, shutdown or malfunction event that has occurred;

### Fails to provide for the operation of the source (including associated air pollution control equipment) during a startup, shutdown or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

### Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

## If the startup, shutdown and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown and malfunction plan at the time the permittee developed the plan, the permittee shall revise the startup, shutdown and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment. [40 CFR §63.6(e)(3)(viii)]

# The permittee must keep records of each startup, shutdown and malfunction event and record and report if any action taken during a startup, shutdown or malfunction is not consistent with the procedures in the SSM plan. In addition to the information required in Conditions 19.a through 19.h, the plan must include the following: . [40 CFR §63.1516(a)]

## Procedures to be followed if a monitoring device measures an operating parameter outside the limit(s) established under Conditions or if visible emissions from an exhaust stack indicating abnormal operation of a control device are observed by the permittee;

## Procedures to determine and record the cause of any malfunction and the time the malfunction began and ended; and

## 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.

# Compliance with nonopacity emission standards: The nonopacity emission standards set forth in 40 CFR part 63 apply at all times except during periods of startup, shutdown and malfunction, and as otherwise specified in 40 CFR part 63, subpart RRR. [40 CFR §63.6(f)]

# Compliance with opacity emission standards: The opacity and visible emission standards set forth in 40 CFR part 63, subpart RRR apply at all times except during periods of startup, shutdown and malfunction, and as otherwise specified in 40 CFR part 63, subpart RRR. [40 CFR §63.6(f)]

TESTING REQUIREMENTS

# Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the Department’s Source Sampling Manual. [OAR 340-212-0120, 40 CFR 60.8, and 40 CFR 63.7]

## Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the Department at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for the Department to grant approval and may require EPA approval in addition to approval by the Department.

## Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source test invalid.

## Unless otherwise specified by permit condition or Department approved source test plan, all compliance source tests must be performed as follows:

### At least 90% of the design capacity for new or modified equipment;

### At least 90% of the maximum operating rate for existing equipment; or

### At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.

## Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, the Department may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

## Source test reports prepared in accordance with the Department’s Source Sampling Manual must be submitted to the Department within 45 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

# The following procedures and test methods must be used for measuring particulate matter and HCl emissions from emission units B-3c.1, B-3c.2, and B-3c.3:

## At least once during the permit term, no later than 7/1/2014, either emission unit B-3c.1, B-3c.2, or B-3c.3 must be tested for particulate matter and hydrogen chloride emissions.

## DEQ Method 5 must be used for measuring particulate emissions.

## EPA Method 26 must be used for measuring hydrogen chloride emissions.

## During each test run, the permittee must record the amount of aluminum being fluxed, the type and amount of flux materials and the amount of natural gas being burned.

## EPA Method 9 must be performed for a minimum of 6 minutes during or within 30 minutes before or after each DEQ Method 5 test run.

# Unless otherwise specified in this permit, or an applicable requirement, the Department is not requiring any testing for the applicable emissions limits and standards that apply the emissions units identified in this permit. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in OAR 340-208-0010 and perform the testing in accordance with the Department’s Source Sampling Manual.

**NESHAP Test Methods and Procedures**

**General Performance Test Requirement:**

# All testing performed to demonstrate compliance with NESHAP limits shall be performed in accordance with the applicable general provisions in 40 CFR §63.7 as shown in Attachment B, including, but not limited to the development and implementation of a quality assurance program that includes a site specific test plan and performance test method audit program.

**Subpart RRR Performance Test Requirements:**

# Prior to conducting a performance test, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR §63.7(c). [40 CFR §63.1511(a)]

# Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice or operational standard for each affected source and emissions unit identified in 40 CFR §63.1512. The permittee must also conduct a performance test every 5 years following the initial performance test. The specific performance test requirements are as follows: [40 CFR §63.1511(b), §63.1511(e), and §63.1512]

## Aluminum scrap shredder: The permittee must conduct a performance test to measure PM emissions from aluminum scrap shredder (emissions unit B-5). If visible emissions observations is the selected monitoring option, the permittee must record visible emission observations from each exhaust stack for all consecutive 6-minute periods during the PM emission test according to EPA Method 9 in appendix A to 40 CFR part 60. [40 CFR 60.1512(a)]

## Group 1 furnaces (including melting holding furnaces) without add-on air pollution control devices: For group 1 furnaces(including a melting/holding furnace) without add-on air pollution control devices, the permittee must include data and information demonstrating compliance with the applicable emissions limits in the site-specific monitoring plan. [40 CFR §63.1512(e)]

### If the group 1 furnace processes other than clean charge material, the permittee must conduct emission tests to measure emissions of PM, HCl, and D/F at the furnace exhaust outlet.

### If the group 1 furnace processes only clean charge, the permittee must conduct emission tests to simultaneously measure emission of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the group 1 furnace (including a melting/holding furnace) processes only clean charge.

### The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.

## Secondary aluminum processing unit (SAPU): The permittee must conduct performance tests as described in Conditions 28.c.i and 28.c.ii. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and μg TEQ/Mg of feed/charge for D/F emission from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in Condition 52. A performance test is required for:[40 CFR §63.1512(j)]

### Each group 1 furnace processing only clean charge to measure emissions of PM and either:

#### Emission of HCl (for the emission limit); or

#### The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).

### Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:

#### Emission of HCl (for the emission limit); or

#### The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).

### Each in-line fluxer to measure emissions of PM and HCl.

## Feed/charge weight measurement: During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three runs and calculate and record the total weight. If the compliance is to be determined based aluminum production weight, the permittee must measure the weight of aluminum produced by the emission unit or affected source instead of feed/charge weight. [40 CFR §63.1512(k)]

## Flux injection rate: The permitee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate. [40 CFR §63.1512(o)]

### Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;

### Record the identity, composition and total weight of each addition of solid reactive flux for the three 3 test runs;

### Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using the following equation:



Where,

Wt = Total chlorine usage, by weight;

F1 = Fraction of gaseous or liquid flux that is chlorine;

W1 = Weight of reactive flux gas injected;

F2 = Fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and

W2 = Weight of solid reactive flux.

### Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and

### If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Department.

## Labeling: For each group 1 furnace, group 2 furnace and in-line fluxer, the permittee must submit the information described in 40 CFR §63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in Condition 13.a. [40 CFR §63.1512(r)]

## Capture/collection system: The permittee must submit information as part of the compliance status report to document conformance with the operational standard in Condition 13.b. [40 CFR §63.1512(s)]

# The permittee must conduct each performance test according to the following requirements: [40 CFR §63.1511(b)]

## The permittee must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.

## Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.

## Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle. **Note:** NWA operations are not batch processes.

## Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.

## Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

# The permittee must use the following methods in appendix A of 40 CFR part 60 to determine compliance with the applicable emission limits or standards: [40 CFR §63.1511(c)]

## Method 1 for sample and velocity traverses.

## Method 2 for velocity and volumetric flow rates.

## Method 3 for gas analysis.

## Method 4 for moisture content of the stack gas.

## Method 5 for the concentration of PM.

## Method 9 for visible emission observations.

## Method 23 for the concentration of D/F.

## Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before the lime is introduced to the system.

# The permittee may use an alternative test method, subject to approval by the Administrator (EPA). [40 CFR §63.1511(d)]

# With the approval of the Department, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that: [40 CFR §63.1511(f)]

## The tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emissions units that it represents;

## The tested emissions unit is subject to the same work practices as the emission units that it represents;

## The tested emissions unit is of the same design as the emissions units that it represents;

## The tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents; and

## At least one of each different style of emissions unit at the facility is tested.

# Compliance with the emission limits or standards is determined using the following equations: [40 CFR §63.1513]

## PM, HCl and D/F emission limits: Use the following equation to determine compliance with an emission limit for PM, HCl and D/F:



Where,

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

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

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

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

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

## Conversion of D/F measurements to TEQ units: To convert D/F measurements to TEQ units, the permittee must use the procedures and equations in “Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and –Dibenzofurans (CDDs and CDFs) and 1989 Update” [EPA-625/3-89-016], incorporated by reference in 40 CFR §63.1502, available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia, NTIS no. PB 90-145756.

## Secondary aluminum processing unit: Use the procedures in Conditions 33.c.i, 33.c.ii, and 33.c.iii or the procedure in Condition 33.c.iv to determine compliance with emission limits for a secondary aluminum processing unit.

### Use the following equation to compute the mass-weight PM emissions for a secondary aluminum processing unit. Compliance is achieved if the mass-weight emissions for the secondary aluminum processing unit (EcPM) is less than or equal to the emission limit for the secondary aluminum processing unit (LcPM) calculated using the equation in Condition 12.d.i:



Where,

EcPM = The mass-weighted PM emissions for the secondary aluminum processing unit;

EtiPM = Measured PM emissions for individual emission unit i;

Tti = The average feed rate for individual emission unit i during the operating cycle or performance test period; and

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

### Use the following equation to compute the aluminum mass-weighted HCl emissions for the secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit (EcHCl) is less than or equal to the emission limit for the secondary aluminum processing unit (LcHCl) calculated using the equation in Condition 12.d.ii:

Where,



EcHCl = The mass-weighted HCl emissions for the secondary aluminum processing unit; and

EtiHCl = Measured HCl emissions for individual emission unit i.

### Use the following equation to compute the aluminum mass-weighted D/F emissions for the secondary aluminum processing unit. compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit (EcD/F) is less than or equal to the emission limit for the secondary aluminum processing unit (LcD/F) calculated using the equation in Condition 12.d.iii.

Where,



EcD/F = The mass-weighted D/F emissions for the secondary aluminum processing unit; and

EtiD/F = Measured D/F emissions for individual emission unit i.

### As an alternative to using the equations in Conditions 33.c.i, 33.c.ii, and 33.c.iii, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in Condition 12.b and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in Condition 12.c.

# The permittee must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR §63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the permittee must use the appropriate procedures in this condition and submit the information required by §63.1515(b)(4) in the notification of compliance status report. The permittee may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the Department: [40 CFR §63.1511(g)]

## The complete emission test report(s) used as the basis of the parameter(s) is submitted.

## The same test methods and procedures as required by subpart RRR of 40 CFR part 63 were used in the test.

## The permittee certifies that no design or work practices changes have been made to the source, process, or emission control equipment since the time of the report;

## All processes and control equipment operating parameters required to be monitored were monitored as required in subpart RRR of 40 CFR part 63 and documented in the test report.

MONITORING REQUIREMENTS

The monitoring conditions in this section are based on OAR 340-218-0050(3)(a); unless otherwise specified.

**General Monitoring Requirements**

# The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]

# Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]

# Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

**Facility-wide Monitoring**

# The permittee shall conduct visible emissions observations in accordance with the following procedures, test methods and frequencies for monitoring pertaining to Condition 4 and 9 for emissions units B-3b, B-3c, B-3d, and B-4a:

## Modified EPA Method 9 shall be conducted monthly in accordance with the Department’s Source Sampling Manual at each emission point.

## Each Modified EPA method 9 test shall be conducted for a minimum observation period of six minutes. If any of the observations is equal to or greater than 20% opacity, the observation period shall continue for 60 minutes or until an exceedance of Condition 4 (i.e., more than 12 observations equal to or greater than 20% opacity) has been documented, whichever period is shorter, except as provided in Condition 38.c.

## All visible emissions observations shall be conducted during operating conditions that have the potential to create visible emissions (e.g., during fluxing). Visible emissions observations are not required for periods other than fluxing even though 60 minutes of observations have not been recorded.

## During each visible emissions test, the permittee shall record the amount of aluminum being fluxed and the type and amount of flux materials.

## If six consecutive monthly observations show opacity within the limits specified in Condition 4, the observations need only be done quarterly.

## If the permittee determines that an exceedance has occurred, the observations shall start over with monthly observations.

# The permittee shall maintain a log recording all written complaints or complaints received via telephone by the responsible official or a designated representative that specifically refer to a complaint of fugitive emissions or opacity from the permitted facility for monitoring pertaining to Condition 5, 6 and 7. The log shall also record permittee’s actions to investigate, make a determination as to the validity of the complaint, and resolve the problem, if possible, within two working days of receiving the complaint.

# The permittee shall maintain monthly and annual records of all fuels used, except those fuels used in motor vehicles, for monitoring pertaining to Condition 8.

**NESHAP Emissions Monitoring Requirements**

**General Monitoring Requirement**

# All monitoring shall be performed in accordance with the applicable general provisions in subpart A of 40 CFR part 63 as shown in Attachment B and the following specific requirements.

**Subpart RRR Monitoring Requirements**

# On or after the date the initial performance test is completed, or is required to be completed, whichever date is earlier, the permittee must monitor all control equipment and processes according to the requirements in 40 CFR §63.1510. Monitoring requirements for each type of affected source and emission unit are summarized in Attachment D. [40 CFR §63.1510(a)]

# The permittee must prepare and implement for each new or existing affected source and emissions unit, a written operation, maintenance and monitoring (OM&M) plan. The permittee must submit the plan to the Department for review and approval. Any subsequent changes to the plan must be submitted to the Department for review and approval. Pending approval by the Department of an initial or amended plan, the permittee must comply with the provisions of the submitted plan. Each plan must contain: [40 CFR §63.1510(b)]

## 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, as determined in accordance with Condition 34.

## A monitoring schedule for each affected source and emission unit.

## Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR §63.1505.

## Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

### Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer’s instructions; and

### Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provision in subpart A of 40 CFR part 63.

## Procedures for monitoring process and control device parameters and the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.

## Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in Condition , including procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended.

## 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.

## Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR §63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.

# Labeling: The permittee must inspect the labels for each group 1 furnace, group 2 furnace and in-line fluxer at least once per calendar month to confirm that posted labels as required by Condition are intact and legible. [40 CFR §63.1510(c)]

# Capture/collection system: The permittee must: [40 CFR §63.1510(d)]

## Install, operate and maintain a capture/collection system for each affected source and emission unit quipped with an add-on air pollution control device; and

## Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in Condition 13.b and record the results of each inspection.

# Feed/charge weight: The permittee must install, calibrate, operate and maintain a device to measure and record the total weight of feed/charge to, or aluminum production from, any affected source and emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (grains/ton) of feed/charge over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production with SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the Department to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit. [40 CFR §63.1510(e)]

## The accuracy of the weight measurement device or procedure must be ±1 percent of the weight being measured. The permittee may apply to the Department for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides 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 every 6 months.

# Total reactive flux injection rate: These requirements apply to each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer. The permittee must: [40 CFR §63.1510(j)]

## Install, calibrate, operate and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.

### The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.

### 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 the Department for permission to use a weight measurement device of alternative 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.

### The permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, of if no calibration schedule is specified, at least once every 6 months.

## Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in Condition 28.e.

## Record, 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 for each addition of:

### Gaseous or liquid flux other than chlorine; and

### Solid reactive flux.

## Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in Condition 28.e.

## For a group 1 furnace or in-line fluxer performing reactive fluxing, the permittee may apply to the Administrator (EPA) for approval of an alternative 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 alternative 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.

# In-line fluxers using no reactive flux: For in-line fluxers that do not use reactive flux materials, the permittee must submit a certification of compliance with the operational standard for no reactive flux materials in 40 CFR §63.1506(l) for each 6-month reporting period. Each certification must contain the information in Condition 76.b.iii. [40 CFR §63.1510(m)]

# Group 1 furnace without add-on air pollution control devices: These requirements apply to a group 1 furnace that is not equipped with an add-on air pollution control device. [40 CFR §63.1510(o)]

## The permittee must develop, in consultation with the Department, a written site-specific monitoring plan in accordance with 40 CFR §63.1510(o) and 40 CFR §63.1510(p) & (q), if applicable. The site-specific monitoring plan must be part of the OM&M plan that addresses monitoring and compliance requirements for PM, HCl and D/F emissions.

## The permittee must submit the site-specific test plan to the Department for review.

# Group 2 furnace: These requirements apply to a new or existing group 2 furnace. The permittee must: [40 CFR §63.1510(r)]

## Record a description of the materials charged to each furnace, including any non-reactive, non-HAP containing/non-HAP-generating fluxing materials or agents.

## Submit a certification of compliance with the applicable operational standard for charge materials in Condition 13.f for each 6-month reporting period. Each certification must contain the information in Condition 76.b.ii.

# Site-specific requirements for secondary aluminum processing units: [40 CFR §63.1510(s)]

## The permittee must include in the OM&M plan required by Condition 43 the following information:

### The identification of each emission unit in the secondary aluminum processing unit;

### The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;

### The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;

### Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of subpart RRR of 40 CFR part 63; and

### The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in Condition .

## The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

### Any averaging among emissions of differing pollutants;

### The inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;

### The inclusion of any emissions unit while it is shutdown; or

### The inclusion of any periods of startup, shutdown or malfunction in emission calculations.

## To revise the SAPU compliance provision within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Department containing the information required by Condition 51.a and obtain approval of the Department prior to implementing any revisions.

# Secondary aluminum processing unit (SAPU): Except as provided in Condition 53, the permittee must calculate and record the 3-day, 24-hour rolling average emission of PM, HCl and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must: [40 CFR §63.1510(t)]

## Calculate and record the total weight of material charged to each emission unit in the secondary processing unit for each 24-hour day of operation using the feed/charge weight information required in Condition . If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.

## Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.

## Divide the total emission for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.

## Compute the 24-hour daily emission rate using the following equation:

Where,



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

Ti = The total amount of feed, or aluminum produced for emissions unit i for the 24-hour period;

ERi = The measured emission rate for emissions unit i as determined in the performance test (lb/ton or µg/Mg of feed/charge); and

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

## Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

# Secondary aluminum processing unit compliance by individual emission unit demonstration: As an alternative to the procedures in Condition 52, the permittee may demonstrate through performance tests, that each individual emissions unit within the secondary aluminum processing unit is in compliance with the applicable emission limits for the emissions unit. [40 CFR §63.1510(u)]

# Alternative monitoring methods: The permittee may submit an application to the Administrator (EPA) for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of 40 CFR part 63 subpart RRR in accordance with the provisions of 40 CFR §63.1510(w).

**Plant Site Emissions Monitoring: [OAR 340-222-0080]**

# The permittee must determine compliance with the Plant Site Emission Limits established in Condition 15 of this permit by conducting monitoring and calculations for each 12-month period in accordance with the following procedures, test methods and frequencies:

## The permittee must calculate emissions using the following formula, process parameters and emission factors:

E = Peu x EFeu x K

Where:

E = Pollutant emissions in lbs/month and tons/yr;

Peu = Process parameter identified in the table below;

EFeu = Emission factor identified for each emissions unit and pollutant in the table below;

K = Conversion constant: 1 lb/lb for daily and monthly emissions calculations; 1 ton/2,000 lbs for annual emissions calculations.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Emission Source Description** | **Throughput Type (units)** | **Emission Factors (lb/throughput unit)** | | | | |
| **PM10** | **SO2** | **NOX** | **CO** | **VOC** |
| Furnaces (GS-1) | Natural gas (million cubic feet) | 7.6 | 2.6 | 100 | 84 | 5.5 |
| Casthouse (GS-2) | Aluminum produced (tons) | 0.058 | NA | NA | NA | NA |
| Fugitives (FS-1) | Aluminum produced (tons) | 0.042 | 0.02 | 0.02 | 0.02 | 0.04 |

## The emissions factors listed in Condition 55.a are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by the calculations contained in this Condition.

RECORDKEEPING REQUIREMENTS

The recordkeeping conditions in this section are based on OAR 340-218-0050(3)(b); unless otherwise specified.

**General Recordkeeping Requirements**

# The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]

## The date, place as defined in the permit and time of sampling or measurements;

## The date(s) analyses were performed;

## The company or entity that performed the analyses;

## The analytical techniques or methods used;

## The results of such analyses;

## The operating conditions as existing at the time of sampling or measurement; and

## The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).

# Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [340-212-0160, OAR 340-214-0110 and 340-218-0050(3)(b)]

# Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]

# Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report or application. [OAR 340-218-0050(b)(B)]

**Source Specific Recordkeeping Requirements**

# The permittee shall maintain the following specific records of required monitoring information that include the following:

## Monthly and annual secondary aluminum production;

## Monthly and annual amount of pre-processed aluminum used;

## Monthly and annual amount of fuels used by type;

## Monthly and annual amount of dross shipped;

## Monthly and annual amount of painted scrap processed;

## Monthly pollutant emissions calculations;

## Complaint log and investigation reports;

## Fugitive dust inspection and maintenance activities;

## Visible emissions observations;

## Weekly inspection reports of the loading and unloading of the dross;

## Changes in collection efficiency of any portion of the collection or control system that resulted from equipment or process changes;

## Occurrence and length of down time for all pollution control devices; and

## Information required by 40 CFR part 82, subpart B: Servicing of Motor Vehicle Air Conditioners.

**NESHAP Recordkeeping Requirements**

# General recordkeeping requirements: [40 CFR §63.10(b)]

## The permittee must maintain files of all information (including all reports and notifications) required by 40 CFR part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks or on microfiche. [40 CFR §63.1517(a)]

## The permittee must maintain relevant records of: [40 CFR §63.10(b)(2)]

### The occurrence and duration of each startup, shutdown or malfunction of operation (i.e., process equipment);

### The occurrence and duration of each malfunction of the air pollution control equipment;

### All maintenance performed on the air pollution control equipment;

### Actions taken during periods of startup, shutdown and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the affected source's startup, shutdown and malfunction plan [see Condition 19];

### All information necessary to demonstrate conformance with the affected source's startup, shutdown and malfunction plan [see Condition 19] when all actions taken during periods of startup, shutdown and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events.);

### All results of performance tests and visible emission observations;

### All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; and

### All documentation supporting initial notifications and notifications of compliance status under Conditions 69 and 72.

## Recordkeeping requirement for applicability determinations: If the permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR part 63, the permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis shall be performed in accordance with requirements established in subparts of 40 CFR part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112 of the CAA, if any. [40 CFR §63.10(b)(3)]

**Subpart RRR Recordkeeping Requirements**

# In addition to the general records required by Condition 61, the permittee must maintain records of: [40 CFR §63.1517(b)]

## For each affected source and emissions unit with emissions controlled by a fabric filter, any of the following that are applicable:

### If a bag leak detection system is used, the number of total operating hours for the affected source or emissions unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

### If a continuous opacity monitoring system is used, records of opacity measurement data, including records where the average opacity of any 6-minute period exceeds 5 percent, with a brief explanation of the cause of the emissions, the time the emissions occurred, the time corrective action was initiated and completed, and the corrective action taken.

### If an aluminum scrap shredder is subject to visible emission observation requirements, records of all Method 9 observations, including records of any visible emissions during a 30-minute daily test, with a brief explanation of the cause of the emissions, the time the emissions occurred, the time corrective action was initiated and completed, and the corrective action taken.

## For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

## For each continuous monitoring system, records required by 40 CFR 60.10(c).

## 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.

## Approved site-specific monitoring plan for a group 1 furnace without add-on air pollution control devices with records documenting conformance with the plan.

## Records of all charge materials for each group 1 melting/holding furnaces without air pollution control devices processing only clean charge.

## Operating logs for each in-line fluxer using no reactive flux materials documenting each flux gas, agent, or material used during each operating cycle.

## Records of all charge materials and fluxing materials or agents for a group 2 furnace.

## Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.

## Records of annual inspections of emissions capture/collection and closed vent systems.

## Records for any approved alternative monitoring or test procedure.

## Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

### Startup, shutdown and malfunction plan;

### OM&M plan; and

### Site-specific secondary aluminum processing unit emission plan, if applicable.

## For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum production for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

## For each in-line fluxer for which the permittee has certified that no reactive flux was used:

### Operating logs which establish that no source of reactive flux was present at the in-line fluxer;

### Labels required pursuant to § 63.1506(b) which establish that no reactive flux may be used at the in-line fluxer; or

### Operating logs which document each flux gas, agent or material used during each operating cycle.

REPORTING REQUIREMENTS

The reporting conditions in this section are based on OAR 340-218-0050(3)(c); unless otherwise specified.

**General Reporting Requirements**

# Excess Emissions Reporting: The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]

## Immediately (within 1 hour of the event) notify the Department of an excess emission event by phone, e-mail or facsimile; and

## Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]

### The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;

### The date and time the owner or operator notified the Department of the event;

### The equipment involved;

### Whether the event occurred during planned startup, planned shutdown, scheduled maintenance or as a result of a breakdown, malfunction or emergency;

### Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown or maintenance activity were followed;

### The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);

### The final resolution of the cause of the excess emissions; and

### Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.

## In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends or holidays, the permittee must immediately notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

## If startups, shutdowns or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown or scheduled maintenance procedures used to minimize excess emissions to the Department for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by the Department in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.

## The permittee must notify the Department of planned startup/shutdown or scheduled maintenance events.

## The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]

# Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” means within 15 days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 63.

# All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]

# Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

|  |  |  |
| --- | --- | --- |
| DEQ – Eastern Region  475 NE Bellevue Dr., Suite 110  Bend, OR 97701  (541) 388-6146 | DEQ – Air Quality Division  811 SW Sixth Avenue  Portland, OR 97204  (503) 229-5359 | Air Operating Permits  US Environmental Protection Agency  1200 Sixth Avenue, Suite 900  Seattle, WA 98101 |

**Semi-annual and Annual Reports**

# The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by the Department. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the DEQ regional office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]]

## The first semi-annual report is due on July 30 and must include: [OAR 340-218-0080]

### The semi-annual compliance certification; and

### 40 CFR part 63, subpart RRR excess emissions report in accordance with Condition 76.

## The annual report is due on February 15 and must consist of the following:

### The emission fee report; [OAR 340-220-0100]

### A summary of the excess emissions upset log; [OAR 340-214-0340]

### The second semi-annual compliance certification as required by OAR 340-218-0080 and 40 CFR part 63, subpart RRR;

### The certification as required in 40 CFR part 82, subpart B; Servicing of Motor Vehicle Air Conditioners, every two years; and

### The following information for the calendar year:

#### Amount of secondary aluminum produced;

#### Amount of pre-processed aluminum used;

#### Amount of aluminum fluxed;

#### Amount of reactive flux used;

#### Amount of fuels used by type;

#### Amount of dross handled;

#### Amount of painted scrap used;

#### Amount of chips and shaving with cutting fluid residue used;

#### Hours of operation; and

#### Annual pollutant emissions calculated each month for each 12-consecutive month period.

# The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]

## The identification of each term or condition of the permit that is the basis of the certification;

## The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements incorporated by reference into the permit. When certifying compliance with new applicable requirements incorporated by reference in the permit, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;

## The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in condition 68.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0010, occurred; and

## Such other facts as the Department may require to determine the compliance status of the source.

## Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

**NESHAP Notifications [**40 CFR §63.1515]

# Initial notifications: For new or reconstructed sources, the permittee must submit an initial notification in accordance with 40 CFR §63.9(b).

# Request for extension of compliance: If the permittee cannot comply with a relevant standard by the applicable compliance date for that source, or if the permittee has installed BACT or technology to meet LAER consistent with 40 CFR §63.6(i)(5), he/she may submit to the Administrator (or the Department) a request for an extension of compliance as specified in 40 CFR §63.6(i)(4) through 40 CFR §63.6(i)(6). [40 CFR §63.9(c)]

# Notification that source is subject to special compliance requirements: If the permittee is subject to special compliance requirements as specified in 40 CFR §63.6(b)(3) and §63.6(b)(4), the permittee shall notify the Administrator of his/her compliance obligations not later than the notification dates established in Condition 69 for new sources that are not subject to the special provisions. [40 CFR §63.9(d)]

# Notification of compliance status: For new or reconstructed sources, the permittee shall submit a notice of compliance status in accordance with 40 CFR §63.1515(b).

# The permittee may request and the Department may approve adjustments to time periods or postmark deadlines for submittal and review of required communications in accordance with 40 CFR §63.9(i).

# Change in information already provided: Unless otherwise specified by a permit condition or applicable requirement, any change in the information already provided under conditions of this permit shall be provided to the Department in writing within 15 calendar days after the change. [40 CFR §63.10(j)]

**SUBPART RRR NESHAP SPECIFIC REPORTING REQUIREMENTS**

# *Startup, shutdown and malfunction plan/reports:* The permittee must develop and implement a written plan as described in Condition 19 that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee must also keep records of each event as required by Condition 61 and record and report if an action taken during a startup, shutdown or malfunction is not consistent with the procedures in the plan as described in Condition 19. In addition to the information required in Condition 19, the plan must include: [40 CFR §63.1516(a)]

## Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

## 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.

# *Excess emissions/summary report:* The permittee must submit semiannual reports according to the requirements in § 63.10(e)(3). Except, the owner or operator must submit the semiannual reports within 60 days after the end of each 6-month period instead of within 30 days after the calendar half as specified in 40 CFR 63.10(e)(3)(v). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.

## A report must be submitted if any of these conditions occur during a 6-month reporting period:

### The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour;

### The corrective action specified in the OM&M plan for a continuous opacity monitoring deviation was not initiated within 1 hour;

### The corrective action specified in the OM&M plan for visible emissions from an aluminum scrap shredder was not initiated within 1 hour;

### An excursion of a compliant process or operating parameter value or range (*e.g.,* lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap or other approved operating parameter);

### An action taken during a startup, shutdown or malfunction was not consistent with the procedures in the plan as described in § 63.6(e)(3);

### An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart; and

### A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.

## Each report must include each of these certifications, as applicable:

### For each group 1 melting/holding furnace without add-on air pollution control devices and using pollution prevention measures that processes only clean charge material: ‘‘Each group 1 furnace without add-on air pollution control devices subject to emission limits in § 63.1505(i)(2) processed only clean charge during this reporting period.’’

### For each group 2 furnace: ‘‘Only clean charge materials were processed in any group 2 furnace during this reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non- HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during this reporting period.’’

### For each in-line fluxer using no reactive flux: ‘‘Only nonreactive, non- HAP-containing, non-HAP-generating flux gases, agents or materials were used at any time during this reporting period.’’

## The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

# *Annual compliance certifications:* For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:

## Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by this subpart; and

## All monitoring, recordkeeping, and reporting requirements were met during the year.

Non-Applicable Requirements

# The following State and Federal air quality requirements \ are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

|  |  |  |
| --- | --- | --- |
| **Rule Citation** | **Summary** | **Reason for Not Being Applicable** |
| OAR 340-236-0120 through 0150 | Primary Aluminum Standards | The primary smelter no longer exists at the site. |
| 40 CFR Part 63, subpart LL | NESHAP for primary aluminum reduction plants |
| 40 CFR Part 63, subpart RRR | Requirements for continuous monitoring systems (CMS) | NWAS does not operate CMS. |

General Conditions

1. General Provision

Terms not otherwise defined in this permit have the meaning assigned to such terms in the referenced regulation.

1. Reference materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in this permit:

* 1. Source Sampling Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A4;
  2. Continuous Monitoring Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A6; and
  3. All state and federal regulations as in effect on the date of issuance of this permit.

1. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

1. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]
   1. The permittee must comply with all conditions of this permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
   2. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
   3. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.
2. Masking Emissions

The permittee may not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400] This condition is enforceable only by the State.

1. Credible Evidence

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

1. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to the Department or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to the Department a material error or omission in these records, reports, plans, or other documents.

1. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

1. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

1. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

1. Permit Shield [OAR 340-218-0110]
   1. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:
      1. such applicable requirements are included and are specifically identified in the permit, or
      2. the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
   2. Nothing in this rule or in any federal operating permit alters or affects the following:
      1. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
      2. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
      3. the applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
      4. the ability of the Department to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
   3. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by the Department.
2. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow the Department of Environmental Quality, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

* 1. Enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
  2. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
  3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  4. As authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

1. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to the Department of Environmental Quality, Business Office, 811 SW 6th Avenue, Portland, OR 97204, within 30 days of the date the Department mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to the Department of Environmental Quality. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

1. Off-Permit Changes to the Source [OAR 340-218-0140(2)]
   1. The permittee must monitor for, and record, any off-permit change to the source that:
      1. is not addressed or prohibited by the permit;
      2. is not a Title I modification;
      3. is not subject to any requirements under Title IV of the FCAA;
      4. meets all applicable requirements;
      5. does not violate any existing permit term or condition; and
      6. may result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
   2. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to the Department and the EPA.
   3. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
   4. The permit shield of condition G11 does not extend to off-permit changes.
2. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]
   1. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
      1. violate an applicable requirement;
      2. contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
      3. be a Title I modification.
   2. A minimum 7-day advance notification must be submitted to the Department and the EPA in accordance with OAR 340-218-0140(3)(b).
   3. The permit shield of condition G11 does not extend to section 502(b)(10) changes.
3. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

* 1. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
  2. Sale or exchange of the activity or facility.

1. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

1. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

1. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding conditions G17 and G18, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

1. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from the Department prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

1. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from the Department and having satisfied the requirements of OAR 340, Division 224.

1. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a 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.

1. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to the Department, within a reasonable time, any information that the Department 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 must also furnish to the Department copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to the Department along with a claim of confidentiality.

1. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]
   1. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the Department.
   2. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
   3. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.
2. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

1. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]
   1. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
   2. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless the Department requests an earlier submittal. If more than 12 months is required to process a permit renewal application, the Department must provide no less than six (6) months for the owner or operator to prepare an application.
   3. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.
2. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

1. Property Rights [OAR 340-200-0020 and 340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

1. Permit Availability [OAR 340-200-0020 and 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to the Department or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

DEQ - Eastern Region

475 NE Bellevue Dr., Suite 110

Bend, OR 97701

(541) 388-6146

Attachment A: Cross-reference from New Rule Numbers to Old Rule Numbers (Effective March 24, 2003)

| **New Rule Number** | **Old Rule Number** |
| --- | --- |
| 208-0110 | 021-0015 |
| 208-0200 | 021-0055 |
| 208-0210 | 021-0060 |
| 214-0300 | 028-1400 |
| 214-0310 | 028-1410 |
| 214-0320 | 028-1420 |
| 214-0330 | 028-1430 |
| 214-0340 | 028-1440 |
| 214-0350 | 028-1450 |
| 214-0360 | 028-1460 |
| 218-0010 | 028-2100 |
| 218-0020 | 028-2110 |
| 218-0040 | 028-2120 |
| 218-0050 | 028-2130 |
| 218-0060 | 028-2140 |
| 218-0070 | 028-2150 |
| 218-0080 | 028-2160 |
| 218-0090 | 028-2170 |
| 218-0100 | 028-2180 |
| 218-0110 | 028-2190 |
| 218-0120 | 028-2200 |
| 218-0130 | 028-2210 |
| 218-0140 | 028-2220 |
| 218-0150 | 028-2230 |
| 218-0160 | 028-2240 |
| 218-0170 | 028-2250 |
| 218-0180 | 028-2260 |
| 218-0190 | 028-2270 |
| 218-0200 | 028-2280 |
| 218-0210 | 028-2290 |
| 218-0220 | 028-2300 |
| 218-0230 | 028-2310 |
| 218-0240 | 028-2320 |
| 218-0250 | 028-1790 |
| 220-0010 | 028-2560 |
| 220-0030 | 028-2580 |
| 220-0040 | 028-2590 |
| 220-0050 | 028-2600 |
| 220-0060 | 028-2610 |
| 220-0070 | 028-2620 |
| 220-0080 | 028-2630 |
| 220-0090 | 028-2640 |
| 220-0100 | 028-2650 |
| 220-0110 | 028-2660 |
| 220-0120 | 028-2670 |
| 220-0130 | 028-2680 |
| 220-0140 | 028-2690 |
| 220-0150 | 028-2700 |
| 220-0160 | 028-2710 |
| 220-0170 | 028-2720 |
| 220-0180 | 028-2730 |
| 220-0190 | 028-2740 |
| 264-0010 | 023-0022 |
| 264-0020 | 023-0025 |
| 264-0030 | 023-0030 |
| 264-0040 | 023-0035 |
| 264-0050 | 023-0040 |
| 264-0060 | 023-0042 |
| 264-0070 | 023-0043 |
| 264-0080 | 023-0045 |
| 264-0100 | 023-0055 |
| 264-0110 | 023-0060 |
| 264-0120 | 023-0065 |
| 264-0130 | 023-0070 |
| 264-0140 | 023-0075 |
| 264-0150 | 023-0080 |
| 264-0160 | 023-0085 |
| 264-0170 | 023-0090 |
| 264-0180 | 023-0100 |
| 264-0190 | 023-0105 |
| 264-0200 | 023-0115 |

Attachment B: 40 CFR part 63 General Provisions Incorporated by Reference

| **Section/Sub-section** | **Description** | **Permit Action** |
| --- | --- | --- |
| §63.1 | part 63 applicability | Incorporated by reference, except EPA retains approval authority for subpart RRR. |
| §63.2 | Definitions | Incorporated by reference, except §63.1503 includes additional definitions. |
| §63.3 | Units and abbreviations | Incorporated by reference. |
| §63.4 | Prohibited activities and circumvention | Incorporated by reference. |
| §63.5 | Construction and reconstruction | Incorporated by reference. |
| §63.6 | Compliance with standards and maintenance requirements | Incorporated by reference, except as specified for specific sub-sections below. |
| §63.6(c)(1) | Compliance dates for existing sources | Incorporated by reference, except §63.1501 specifies compliance dates for subpart RRR. |
| §63.6(e) | Operation and maintenance requirements (SSM plans) | Incorporated by reference in addition to specific requirements included in permit conditions. |
| §63.6(h) | Compliance with opacity and visible emissions standards | Incorporated by reference for subpart RRR. |
| §63.7 | Performance testing requirements | Incorporate by reference, except as specified for specific sub-sections below. |
| §63.7(a) | Applicability and performance test dates | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.7(b) | Notification of performance test | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.7(c) | Quality assurance program (site-specific test plan) | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.7(g) | Data analysis, recordkeeping, and reporting | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.8 | Monitoring requirements | Incorporate by reference, except as specified for specific sub-sections below. |
| §63.8(b) | Conduct of monitoring | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.8(c) | Operation and maintenance of continuous monitoring systems | Incorporated by reference. |
| §63.8(d) | Quality control program | Incorporated by reference. |
| §63.8(e) | Performance evaluation of continuous monitoring systems | Incorporated by reference. |
| §63.8(f) | Use of an alternative monitoring method | Incorporated by reference, except §63.8(f)(1)-(4) do not apply to subpart RRR. |
| §63.8(g) | Reduction of monitoring data | Incorporated by reference, except §63.8(2) is not applicable to subpart RRR. |
| §63.9 | Notification requirements | Incorporated by reference, except as specified for specific sub-sections below. |
| §63.9(b) | Initial notifications | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.9(e) | Notification of performance test | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.9(f) | Notification of opacity and visible emission observations | Incorporated by reference in addition to specific requirements included as permit Conditions. |
| §63.9(g) | Additional notification for sources with continuous monitoring systems | Incorporated by reference in addition to specific requirements included as permit Conditions. |
| §63.9(h) | Notification of compliance status | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.10 | Recordkeeping and reporting requirements | Incorporate by reference, except as specified for specific sub-sections below. |
| §63.10(b) | General recordkeeping requirements | Incorporated by reference in addition to specific requirements included as permit conditions. |
| §63.10(d) | General reporting requirements | Incorporated by reference in addition to specific requirements included as permit Conditions. |
| §63.10(e) | Additional reporting requirements for sources with continuous monitoring systems | Incorporated by reference in addition to specific requirements included as permit Conditions. |
| §63.12 | State authority and delegations | Incorporated by reference. |
| §63.13 | Addresses of state air pollution control agencies and EPA regional offices | Incorporated by reference. |
| §63.14 | Incorporation by reference | Incorporated by reference. |
| §63.15 | Availability of information and confidentiality | Incorporated by reference. |

Attachment C: Table 2 to 40 CFR Part 63 Subpart RRR

Summary of Operating Requirements for New and Existing Affected Sources and Emission Units

| **Affected Source/Emission Unit** | **Monitor Type/Operation/Process** | **Operating Requirements** |
| --- | --- | --- |
| All affected sources and emissions units with an add-on air pollution control devices. | Emission capture and collection system. | Design and install in accordance with Industrial Ventilation: A Handbook of Recommended Practice; operate in accordance with OM&M plan.b |
| All affected sources and emissions units subject to production-based (lb/ton of feed) emission limits.a | Charge/feed weight or production weight. | Operate a device that records the weight of each charge; Operate in accordance with OM&M plan.b |
| Group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln. | Labeling | Identification, operating parameter ranges and operating requirements posted at affected sources and emission units; control device temperature and residence time requirements posted at scrap dryer/delacquering/decoating kiln. |
| Aluminum scrap shredder with fabric filter  **Note:** these requirements are not considered applicable to NWA because the shredder does not have an add-on control device. | Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM; or | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| VE | Initiate corrective action within 1 hour of any observed VE and complete in accordance with OM&M plan.b |
| Thermal chip dryer with afterburner  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Afterburner operating temperature | Maintain average temperature for each 3-hour period at or above average operating temperature during the performance test. |
| Afterburner operation | Operate in accordance with OM&M plan.b |
| Feed material | Operate using only unpainted aluminum chips. |
| Scrap dryer/delacquering kiln/decoating kiln with afterburner and lime-injected fabric filter  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Afterburner operating temperature | Maintain average temperature for each 3-hour period at or above average operating temperature during the performance test. |
| Afterburner operation | Operate in accordance with OM&M plan.b |
| Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| Fabric filter inlet temperature | Maintain average fabric filter inlet temperature for each 3-hour period at or below average temperature during the performance test +14ºC (+25ºF) |
| Lime injection rate | Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established during the performance test for continuous injections systems. |
| Sweat furnace with afterburner  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Afterburner operating temperature | If a performance test was conducted, maintain average temperature for each 3-hour period at or above average operating temperature during the performance test; if a performance test was not conducted, and afterburner meets specifications of §63.1505(f)(1), maintain average temperature for each 3-hour period at or above 1600ºF. |
| After burner operation | Operate in accordance with OM&M plan.b |
| Dross-only furnace with fabric filter  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| Feed/charge material | Operate using only dross as the feed materials. |
| Rotary dross cooler  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| In-line fluxer with lime-injected fabric filter (including those that are part of a secondary aluminum processing unit).  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| Lime injection rate | Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established during the performance test for continuous injections systems. |
| Reactive flux injection rate | Maintain reactive flux injection rate at or below rate used during the performance test for each operating cycle or time period used in the performance test. |
| In-line fluxer (using no reactive flux material) | Flux materials | Use no reactive flux. |
| Group 1 furnace with lime-injected fabric filter (including those that are part of a secondary aluminum processing unit)  **Note:** NWA’s operation do not include this type of equipment so operating requirements are not applicable. | Bag leak detector; or | Initiate corrective action within 1 hour of alarm and complete in accordance with OM&M planb; operate such that alarm does not sound more than 5% of operating time in 6 month period. |
| COM | Initiate corrective action within 1 hour of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.b |
| Fabric filter inlet temperature | Maintain average fabric filter inlet temperature for each 3-hour period at or below average temperature during the performance test +14ºC (+25ºF) |
| Reactive flux injection rate | Maintain reactive flux injection rate at or below rate used during the performance test for each operating cycle or time period used in the performance test. |
| Lime injection rate | Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established during the performance test for continuous injections systems. |
| Maintain molten aluminum level | Operate sidewell furnaces such that the level of the molten metal is above the top of the passage between sidewell and hearth during reactive flux injection, unless the hearth is also controlled. |
| Fluxing in sidewell furnace hearth | Add reactive flux only to the sidewell of the furnace unless the hearth is also controlled. |
| Group 1 furnace without add-on controls (including those that are part of a secondary aluminum processing unit). | Reactive flux injection rate | Maintain reactive flux injection rate at or below rate used during the performance test for each operating cycle or time period used in the performance test. |
| Site-specific monitoring planc | Operate furnace within the range of charge materials, contaminant levels, and parameter values established in the site-specific monitoring plan. |
| Feed material (melting/holding furnace) | Use only clean charge. |
| Clean (group 2) furnace | Charge and flux materials | Use only clean charge. Use no reactive flux. |

aThermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, dross-only furnaces, in-line fluxers and group 1 furnaces including melting/holding furnaces.

bOM&M plan – Operation, maintenance, and monitoring plan.

cSite-specific monitoring plan. Owners/operators of group 1 furnaces without control devices must include a section in their OM&M plan that documents work practice and pollution prevention measures, including procedures for scrap inspection, by which compliance is achieved with emission limits and process or feed parameter-based operating requirements. This plan and the testing to demonstrate adequacy of the monitoring plan must be developed in coordination with and approved by the Department.

Attachment D: Table 3 to 40 CFR Part 63 Subpart RRR

Summary of Monitoring Requirements for New and Existing Affected Sources and Emission Units

| **Affected Sources/Emissions Unit** | **Monitor Type/Operation/Processes** | **Monitoring Requirements** |
| --- | --- | --- |
| All affected sources and emission units with an add-on air pollution control device | Emission capture and collection system. | Annual inspection of all emission capture, collection, and transport system to ensure that systems continue to operate in accordance with ACGIH standards. |
| All affected sources and emission units subject to production-based (lb/ton feed/charge) emission limitsa. | Feed/charge weight | Record weight of each feed/charge, weight measurement device or other procedure accuracy of ±1%b; calibrate according to manufacturers specification, or at least once every 6 months. |
| Group 1 furnaces, group 2 furnaces, in-line fluxers, and scragp dryer/delacquering kiln/decoating kiln. | Labeling | Check monthly to confirm that labels are intact and legible. |
| Aluminum scrap shredder with fabric filter.  **Note:** There is no control device on the shredder at NWA so these monitoring requirements are not applicable. | Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| VE | Conduct and record results of 30-minute daily test in accordance with Method 9. |
| Thermal chip dryer with afterburner  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Afterburner operating temperature | Continuous measurement device to meet specifications in 40 CFR §63.1510(g)(1); record average temperature for each 15-minute block period; determine and record 3-hour block averages. |
| Afterburner operation | Annual inspection of afterburner internal parts; complete repairs in accordance with OM&M plan. |
| Feed/charge material | Record identity of each feed/charge; certify feed/charge materials every 6 months. |
| Scrap dryer/delacquering kiln/decoating kiln with after burner and lime injected fabric filter  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Afterburner operating temperature | Continuous measurement device to meet specifications in 40 CFR §63.1510(g)(1); record average temperature for each 15-minute block period; determine and record 3-hour block averages. |
| Afterburner operation | Annual inspection of afterburner internal parts; complete repairs in accordance with OM&M plan. |
| Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| Lime injection rate | For continuous injection systems, inspect each feed hopper or silo every 8 hours to verify that lime is free-flowing; record results of each inspection. If blockage occurs, inspect every 4 hours for 3 days; return to 8 hour inspections if corrective action results in no further blockage during 3-day period; record feeder setting daily. |
| Fabric filter inlet temperature | Continuous measurement device to meet specifications in 40 CFR §63.1510(g)(1); record average temperature for each 15-minute block period; determine and record 3-hour block averages. |
| Sweat furnace with afterburner  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Afterburner operating temperature | Continuous measurement device to meet specifications in 40 CFR §63.1510(g)(1); record average temperature for each 15-minute block period; determine and record 3-hour block averages. |
| Afterburner operation | Annual inspection of afterburner internal parts; complete repairs in accordance with OM&M plan. |
| Dross-only furnace with fabric filter  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| Feed/charge material | Record identity of each feed/charge; certify feed/charge materials every 6 months. |
| Rotary dross cooler with fabric filter  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| In-line fluxer with lime-injected fabric filter.  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| Reactive flux injection rate | Weight measurement device accuracy ±1%b; calibrate according to manufacturer’s specifications or at least once every 6 months; record time, weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test; or, Alternative flux injection rate determination procedure per 40 CFR §63.1510(j)(5). |
| Lime injection rate | For continuous injection systems, inspect each feed hopper or silo every 8 hours to verify that lime is free-flowing; record results of each inspection. If blockage occurs, inspect every 4 hours for 3 days; return to 8 hour inspections if corrective action results in no further blockage during 3-day period.d |
| In-line fluxer using no reactive flux | Flux materials | Record flux materials; certify every 6 months for no reactive flux. |
| Group 1 furnace with lime injected fabric filter  **Note:** NWA’s operations do not include this type of equipment or control device so these monitoring requirements are not applicable. | Bag leak detector; or | Install and operate in accordance with “Fabric Filter Bag Leak Detector Guidance”c; record voltage output from bag leak detector. |
| COM, or | Design and install in accordance with PS-1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages. |
| Lime injection rate | For continuous injection systems, inspect each feed hopper or silo every 8 hours to verify that lime is free-flowing; record results of each inspection. If blockage occurs, inspect every 4 hours for 3 days; return to 8 hour inspections if corrective action results in no further blockage during 3-day period.d |
| Reactive flux injection rate | Weight measurement device accuracy ±1%b; calibrate according to manufacturer’s specifications or at least once every 6 months; record time, weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test; or, Alternative flux injection rate determination procedure per 40 CFR §63.1510(j)(5). |
| Fabric filter inlet temperature | Continuous measurement device to meet specifications in 40 CFR §63.1510(g)(1); record average temperature for each 15-minute block period; determine and record 3-hour block averages. |
| Maintain molten aluminum level in sidewell furnace | Maintain aluminum level operating log; certify every 6 months. |
| Fluxing in sidewell furnace hearth | Maintain flux addition operation log; certify every 6 months. |
| Group 1 furnace without add-on controls. | Reactive flux injection rate | Weight measurement device accuracy ±1%b; calibrate according to manufacturer’s specifications or at least once every 6 months; record time, weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test; or, Alternative flux injection rate determination procedure per 40 CFR §63.1510(j)(5). |
| OM&M plan (approved by the Department) | Demonstration of site-specific monitoring procedures to provide data and show correlation of emissions across the range of charge and flux materials and furnace operating parameters. |
| Feed material (melting/holding furnace) | Record type of permissible feed/charge material; certify charge materials every 6 months. |
| Clean (group 2) furnace | Charge and flux materials | Record charge and flux materials; certify every 6 months for clean charge and no reactive flux. |

aThermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, dross-only furnaces, in-line fluxers and group 1 furnaces or melting/holding furnaces.

bThe Department may approve measurement devices of alternative accuracy, for example in cases where flux rates are very low and costs of meters of specified accuracy are prohibitive; or where feed/charge weighing devices of specified accuracy are not practicable due to equipment layout or charging practices.

cNon-triboelectric bag leak detectors must be installed and operated in accordance with manufacturer’s specifications.

dThe Department may approve other alternatives including load cells for lime hopper weight, sensors for carrier gas pressure, or HCl monitoring devices at fabric filter outlet.