Trademark Metals Recycling, LLC

Facility ID No. 0570119
Hillsborough County

Title V Air Operation Permit Revision

DRAFT/PROPOSED Permit No. 0570119-020-AV
(Revision of Title V Air Operation Permit No. 0570119-018-AV)

Permitting and Compliance Authority:

Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619

Telephone: (813)627-2600
Fax: (813)627-2660

Title V Air Operation Permit Revision

Permit No. 0570119-020-AV

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PERMITTEE:
Trademark Metals Recycling, LLC
5401 W Kennedy Blvd. STE 400
Tampa, Florida 33609

DRAFT/PROPOSED Permit No. 0570119-020-AV
Trademark Metals Recycling
Facility ID No. 0570119
Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility to incorporate Permit No. 0570119-016-AC for the increase in process rate and the installation of a charging well on the aluminum holding furnace. This permit revision also includes the reduction in the rotary furnace burner differential pressure monitoring frequency authorized under Permit No. 0570119-019-AC. The existing facility is located in Hillsborough County at 6912 E 9th Avenue, Tampa, Florida. UTM Coordinates are: Zone 17, 364.7 East and 3093.60 North. Latitude is: 27° 57' 44.0'' North; and, Longitude is: 82° 22' 27.0'' West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: [TBD]
Renewal Application Due Date: June 20, 2015
Expiration Date: January 31, 2016

(Draft/Proposed Permit)

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

Subsection A. Facility Description.

Trademark Metals Recycling, LLC is a secondary aluminum smelting facility that processes scrap aluminum received from a variety of businesses and recycling centers. The scrap aluminum is classified, separated and stored in various piles throughout the site in preparation for processing in the furnaces. Prior to smelting, the aluminum scrap is reduced in volume by one of two diesel-fired compactor/balers. The molten aluminum is cast on-site and then sold for reuse in production of other aluminum products.

The primary operation at the facility is the two rotary Group 1 furnaces designated as Aluminum Rotary Furnace #1 (EU No. 005) and Aluminum Rotary Furnace #2 (EU No. 006), which are each fired on natural gas with burners rated at a design capacity of 6.0 MMBtu/hr. The two rotary furnaces are permitted to process up to 6,000 lbs/hr of aluminum scrap per furnace. Permit No. 0570119-017-AC authorized the replacement of the natural gas burners on the two rotary furnaces with 7.5 MMBtu/hr burners, while maintaining the permitted charging rate of 6,000 lbs/hr of aluminum scrap per furnace. Compliance testing will be required for PM, D/F, and visible emissions within 75 days of exceeding the 6.0 MMBtu/hr heat input rate.

Prior to the initial charge of aluminum and as needed throughout the melting process, a flux comprised of a salt and potash blend is placed in the furnaces for removal of the impurities in the scrap aluminum and for temperature control. Cryolite (a compound consisting of calcium aluminum fluorides) and calcium chloride are also added as needed for an increased aluminum recovery rate. Scrap aluminum without a substantial quantity of iron is then loaded into the furnaces with a front end loader. The furnaces are typically charged with primarily aluminum products (beverage cans, milled turnings, rolled aluminum sheets, etc.); however, Aluminum Rotary Furnace #1 is also fed with scrap more contaminated with foreign material (aluminum castings, automotive engines and transmission parts, etc.), which results in a lower quality finished product. After a sufficient quantity has been added, the burner door shuts and the burner is fired. The charge in the rotating furnace then becomes molten after 10-30 minutes. More charge is then added in the same manner until the furnace is full. Occasionally, some additional product (i.e. magnesium, etc.) is then added in small quantities to meet specifications regarding alloy quality. The molten aluminum is then poured into preheated kettles and transferred to a holding furnace, or poured directly into a mold (sow) for cooling and hardening. Dross is skimmed from the surface of the sows prior to hardening. The remaining slag in the furnace is then removed and stored for disposal off-site.

PM, HCl, and D/F (dioxins and furans) emissions from the rotary furnaces are ducted to a 4-chamber lime-injected 50,000 ACFM four-compartment induced-draft Control Design & Integration Model SMF-50-3.0 Reverse Air Type Baghouse. Hoods are present over the openings of each furnace with emissions induced into the corresponding ducts by means of a 50,000 ACFM fan located downstream of the baghouse. The duct for Aluminum Rotary Furnace #1 has a damper set to open at approximately 500ºF to allow for dilution air to cool the exhaust stream. Another damper is present in the duct downstream from the point where the two furnace ducts join together. This duct is also for dilution air, with an opening set-point of approximately 350ºF, as measured in the baghouse chamber. The system also has an emergency shut-off set at approximately 375ºF to protect the baghouse from high temperatures. The baghouse has a continuous feed lime-injection system to control D/F and HCl emissions. As required by applicable MACT standards, a new bag leak detection system was installed on the exhaust of the baghouse to ensure continual compliance. An Operation, Maintenance and Monitoring (OM&M) Plan has been included in the permit, which establishes requirements for maintenance and inspection of the process equipment.

The Holding Furnace (EU No. 004) is used exclusively for storage of molten aluminum and maintains the temperature through use of a combined 6 MMBtu/hr burner arrangement, fired on natural gas. The holding furnace is capable of processing up to 7,000 lbs/hr of clean charge as defined in 40 CFR 63.1503 and is considered a Group 2 furnace. The Holding Furnace may receive molten aluminum directly from the aluminum rotary furnaces via transfer ladle to the charging well, or may melt sows that have been previously cast from the rotary furnaces. Emissions from this operation vent directly to the atmosphere without pollution controls. The molten aluminum is allowed to pass through a 0.25 MMBtu/hr natural gas-fired heated trough and into molds (deox or ingots) running on a conveyor system. The molds are automatically filled and the dross is manually

skimmed. The molds then travel down the conveyor while being water quenched for rapid cooling. The steam from the water quenching is drawn through a stack that exits on the roof. The hardened aluminum is then popped free from the molds and stored for shipment off-site.

The sweat furnace that was previously part of EU No. 004 is an Al-Jon Model AS-990-R-20 dual chamber furnace that is designed to process irony scrap and is controlled by an afterburner. However, it has not operated since 1999, and though it is still on-site, it will require a new air construction permit prior to start-up. Also present at the facility is a second sweat furnace (Model MS-1500), formerly identified as EU No. 001. The furnace has been determined to have been out of service for over 10 years and, pursuant to Rule 62-210.300(2)(a)3.c., F.A.C., cannot resume operation without submission of an air permit application and issuance of an air construction permit. Both sweat furnaces must comply with all requirements of the NESHAP (Subpart RRR) prior to any resumption of operation.

The facility is subject to the Secondary Aluminum NESHAP (40 CFR 63 Subpart RRR) for the rotary and holding furnaces. The rotary furnaces are also subject to PM RACT Rule 62-296.712, F.A.C. The two portable baler engines are not subject to 40 CFR 63 Subpart ZZZZ unless they remain on-site at the facility for more than twelve (12) consecutive months. Also included in the revised Title V permit are miscellaneous unregulated/insignificant emissions units and/or activities

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
004	Holding Furnace
005	Aluminum Rotary Furnace #1
006	Aluminum Rotary Furnace #2

Subsection C. Applicable Regulations.

Based on the Title V air operation permit revision application received October 11, 2013, this facility is an area source of hazardous air pollutants (HAP). This facility is subject to 40 CFR 63 Subpart RRR, National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAP General Provisions	004, 005, 006
40 CFR 63, Subpart RRR	004, 005, 006
Rule 62-296.700, F.A.C. – PM RACT	005, 006
Rule 62-296.712, F.A.C. – PM RACT	005, 006

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

a. Maintain tightly fitting covers, lids, etc., on all containers of VOC/OS when they are not being handled, tapped, etc.

b. Prevent excessive air turbulence across exposed VOC/OS materials.

c. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, batch, etc., of VOC/OS so that it can be covered when not in use.

d. All fittings, valve lines, etc., shall be properly maintained.

e. All VOC/OS spills shall be attended to immediately and the waste properly disposed of, or recycled.

[Rule 62-296.320(1), F.A.C. and 0570119-012-AV]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
[Rule 62-296.320(4)(c), F.A.C.]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each

calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW10. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The first six-month monitoring report is due by September 1st each year, and the 2nd six-month monitoring report should be included with the Annual Statement of Compliance. [Rule 62-213.440(1), F.A.C.]

FW11. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission
of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619

FW12. Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Compliance Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155 Fax: 404/562-9163

FW13. The total maximum allowable emissions of particulate matter (PM) from the entire facility (two rotary furnaces and holding furnace) shall not exceed 39.9 tons for any 12 consecutive month period. [Rules 62-4.070(3) and 62-296.712, F.A.C., and Permit No. 0570119-017-AC]

FW14. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.340(1)(i) and 62-209.500, F.A.C]

FW15. Circumvention. No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C]

FW16. When the Environmental Protection Commission of Hillsborough County, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in Chapter 62-296, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance testing which identify the nature and quantity of air pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. [Rule 62-297.340(2), F.A.C.]

FW17. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

FW18. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(205), F.A.C., Modification. These changes do not include routine maintenance, repair, or replacement of component parts of an emissions unit, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment.
B) Installation or addition of any equipment which is a source of air pollution.
C) Installation of an air pollution control device not otherwise reflected in the permit.

FW19. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

FW20. Applicable Requirements. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

FW21. Rules of the EPC. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

FW22. Chapter 84-446, Laws of Florida. The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

FW23. Each of the two aluminum scrap balers, which are equipped with internal combustion engines, shall not remain on-site for more than 12 consecutive months. Records of the scrap balers' site location shall be kept and made available for inspection upon request by Federal, State, or Local officials. [40 CFR 1068.30 and Rule 62-4.070(3), F.A.C.]

Subsection A. Emission Units 005 and 006

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
-005	Aluminum Rotary Furnace #1
-006	Aluminum Rotary Furnace #2

The primary operation at the facility is the two rotary Group 1 furnaces designated as Aluminum Rotary Furnace #1 (EU No. 005) and Aluminum Rotary Furnace #2 (EU No. 006), which are each fired on natural gas with burners rated at a design capacity of 6.0 MMBtu/hr. The two rotary furnaces are permitted to process up to 6,000 lbs/hr of aluminum scrap per furnace. Permit No. 0570119-017-AC authorized the replacement of the natural gas burners on the two rotary furnaces with 7.5 MMBtu/hr burners, while maintaining the permitted charging rate of 6,000 lbs/hr. The facility is authorized to replace the 6.0 MMBtu/hr burners with 7.5 MMBtu/hr burners, provided compliance tests for PM, D/F, and visible emissions are conducted within 75 days of exceeding the 6.0 MMBtu/hr heat input rate.

Prior to the initial charge of aluminum and as needed throughout the melting process, a flux comprised of a salt and potash blend is placed in the furnaces for removal of the impurities in the scrap aluminum and for temperature control. Cryolite (a compound consisting of calcium aluminum fluorides) and calcium chloride are also added as needed for an increased aluminum recovery rate. Scrap aluminum without a substantial quantity of iron is then loaded into the furnaces with a front end loader. The furnaces are typically charged with primarily aluminum products (beverage cans, milled turnings, rolled aluminum sheets, etc.); however, Aluminum Rotary Furnace #1 is also fed with scrap more contaminated with foreign material (aluminum castings, automotive engines and transmission parts, etc.), which results in a lower quality finished product. After a sufficient quantity has been added, the burner door shuts and the burner is fired. The charge in the rotating furnace then becomes molten after 10-30 minutes. More charge is then added in the same manner until the furnace is full. Occasionally, some additional product (i.e. magnesium, etc.) is then added in small quantities to meet specifications regarding alloy quality. The molten aluminum is then poured into preheated kettles/transfer ladles and transferred to a holding furnace, or poured directly into a mold (sow) for cooling and hardening. Dross is skimmed from the surface of the sows prior to hardening. The remaining slag in the furnace is then removed and stored for disposal off-site.

PM, HCl, and D/F (dioxins and furans) emissions from the rotary furnaces are ducted to a 4-chamber lime-injected 50,000 ACFM four-compartment induced-draft Control Design & Integration Model SMF-50-3.0 Reverse Air Type Baghouse. Hoods are present over the openings of each furnace with emissions induced into the corresponding ducts by means of a 50,000 ACFM fan located downstream of the baghouse. The duct for Aluminum Rotary Furnace #1 has a damper set to open at approximately 500ºF to allow for dilution air to cool the exhaust stream. Another damper is present in the duct downstream from the point where the two furnace ducts join together. This duct is also for dilution air, with an opening set-point of approximately 350ºF, as measured in the baghouse chamber. The system also has an emergency shut-off set at approximately 375°F to protect the baghouse from high temperatures. The baghouse has a continuous feed lime-injection system to control D/F and HCl emissions. As required by applicable MACT standards, a new bag leak detection system was installed on the exhaust of the baghouse to ensure continual compliance. An Operation, Maintenance and Monitoring (OM&M) Plan has been included in the permit, which establishes requirements for maintenance and inspection of the process equipment.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable permitted process rates are as follows:

a. Maximum Permitted Design Capacity:

EU No.	MMBtu/hr Heat Input[1]	Charging Rate (lb/hr)[1]	Charging Rate (tpy)	Fuel Type
005	7.5	6,000	26,280	Natural Gas
006	7.5	6,000	26,280	Natural Gas

[1]Based on a daily average, including only the hours that each rotary furnace actually operated.

b. Maximum Operational Capacity: Notwithstanding that the maximum permitted burner design capacity is 7.5 MMBtu/hr per rotary furnace, the permittee shall not operate the rotary furnaces at a higher heat input rate than 6.0 MMBtu/hr per rotary furnace. If the permittee operates at a heat input rate higher than 6.0 MMBtu/hr, the permittee shall test the affected rotary furnace(s) for PM, D/F, and visible emissions within 75 days of exceeding the 6.0 MMBtu/hr heat input rate, in accordance with this permit and 40 CFR 63 Subpart RRR. The permittee shall then be permitted to operate at the higher heat input rate provided the test demonstrates compliance with the applicable emission limit and does not exceed the maximum design rate of 7.5 MMBtu/hr. Submission of site-specific test plans and compliance testing notifications shall be conducted in accordance with the Specific Conditions in this permit. *{Permitting Note: This permit condition is based on the fact that historical compliance testing for these Emissions Units has been conducted at no more than 6 MMBtu/hr. Operation at a higher heat input rate does not permit the facility to exceed the hourly and annual charging rates.}*

*[Rules 62-4.160(2), 62-*204.800, 62-210.200(PTE), and Air Construction Permit No. 0570119-017-AC.]

A.2. Methods of Operation.

a. *Fuels.* The fuel that is allowed to be burned in these units is:
(1) Natural gas

b. The rotary furnaces shall be operated in accordance with the OM&M Plan pursuant to 40 CFR 63 Subpart RRR, which is attached to this permit.

[Rule 62-213.410, F.A.C.; and Air Construction Permit No. 0570119-017-AC.]

A.3. Hours of Operation. These emission units may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Permit No. 0570119-013-AC]

A.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging time(s) for Specific Condition(s) A.5 through A.7. are based on the specified averaging time of the applicable test method.

A.5. Visible Emissions. Visible emissions from each rotary furnace shall not exceed 5% opacity. [Rule 62-296.712(2), F.A.C.]

A.6. PM Emissions. Particulate matter emissions shall not exceed 0.03 gr/dscf. [Rule 62-296.712(2), F.A.C.]

A.7. D/F Emissions. Dioxin/furan emissions shall not exceed 15 μg of D/F TEQ per Mg (0.00021 grains of D/F TEQ per ton) of feed/charge. The owner or operator may determine the dioxin/furan emission standards 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 feed/charge. This may only be accomplished through a formal

performance test showing compliance with the emission limit stated above. Once validated, a correlation between the feed/charge and actual production during the test can be made to formulate an emission standard based on production. Once approved, production data can be used to show continual compliance with recordkeeping requirements in Specific Condition No. A.25. [40 CFR 63.1505(i)]

A.8. [RESERVED]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.9. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

A.10. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C.]

A.11. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.12. OM&M Plan. These emissions units are subject to the Operation, Maintenance, and Monitoring (OM&M) Plan which is an enforceable attachment to this permit. Included with the OM&M Plan as an attachment is the Startup, Shutdown, and Malfunction (SSM) Plan. This facility shall comply with all the applicable requirements of these plans. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. The permittee must comply with all of the provisions of the OM&M Plan as submitted to the permitting authority, unless and until the plan is revised in accordance with the following procedures. If the permitting authority determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or 40 CFR 63 Subpart RRR, the owner or operator must promptly make all necessary revisions and resubmit the revised plan. [40 CFR 63.1510(b) and 63.1516(a); Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C., and Air Construction Permit No. 0570119-017-AC]

Continuous Monitoring Requirements

A.13. Operation of the baghouse and related control equipment must be in accordance with the OM&M Plan. Included in the requirements for operation are:

a. A bag leak detection system must be calibrated, maintained and in continuous operation in the exhaust stack of the baghouse in conjunction with 40 CFR 63.1510(f). An alarm system must be maintained that will sound automatically when an increase in relative PM emissions over a preset level is detected.
b. Corrective action must be initiated within 1 hour of a bag leak detection system alarm and performed in accordance with the OM&M Plan. Each fabric filter system must be operated such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period.
c. Short-term operation of the baghouse is permitted in the OM&M Plan with only 3 of the 4 baghouse chambers in operation. Corrective action to regain use of the 4th chamber must be initiated immediately, and operation of the baghouse with less than 3 chambers is prohibited.

d. The permittee must calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with 40 CFR 63.1510(h). The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512(n). The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period.
e. The 3-hour block average inlet temperature for each fabric filter must be maintained and recorded at or below the average temperature established during the performance test, plus 14 °C (plus 25 °F). The average temperature established during the most recent performance test is 204°F. This requirement shall be effective following the dioxin/furan test required by Specific Condition A.20.
f. For the continuous lime-injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime-feeder setting at the same level established during the performance test. The permittee must verify that the lime is free-flowing through an inspection at least every 12 hours and a record of the lime-feeder setting must be recorded each day of operation. If lime is found not to be free-flowing during any of the 12-hour periods, the owner or operator must increase the frequency of inspections to at least once every 6-hour period for the next 3 days. The owner or operator may return to inspections at least once every 12-hour period if corrective action results in no further blockages of lime during the 3-day period.
g. In case of mechanical failure of the lime-injection system, the permittee may return to the former method of intermittent batch loading of lime prior to starting the process; however, immediate corrective action to restore the lime-injection system must be initiated. The intermittent lime-loading must follow the procedure as specified in the OM&M Plan. A permanent return to the intermittent batch loading of lime process may not occur without obtaining approval from the permitting authority, and additional performance testing using this system may be required.
h. The permittee should use all reasonable precautions to reduce turbulence of the exhaust stream from the furnaces to enhance capture by the hoods. Reasonable precautions include managing the charge to practical levels and reducing the induced draft from the furnaces by minimizing the speeds at which the burner doors are opened and the loading forklift retreats from the rotary chambers.

[Rule 62-4.070(3), F.A.C., 40 CFR 63.1506(m) and 63.1510(f), (h), and (i)]

A.14. Calibration of monitoring equipment shall be followed as identified in the OM&M Plan. The scales, pressure gauges for the baghouse, temperature gauges and baghouse leak detection system shall be calibrated at least on an annual basis. The bag leak detection system calibration may be less frequent if validated by the manufacturer. The baghouse inlet temperature thermocouple must be calibrated <u>semi-annually</u>. All remaining thermocouples (i.e. dampers, bypass, etc.) must be calibrated at a minimum of every 5 years, prior to the performance test. [Rule 62-4.070(3), F.A.C., 40 CFR 63.1510]

A.15. When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the most recent successful performance test and incorporated in the OM&M Plan, the owner or operator 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 a deviation. [40 CFR 63.1506(p)]

A.16. At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain the rotary furnaces, including the baghouse and associated monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the Startup, Shutdown, and Malfunction Plan. 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, and the source exceeds any applicable emission limitation in the relevant emission standard, then the owner or operator must record the actions taken for that event and must 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. Any revision to the Startup, Shutdown, and Malfunction Plan must be reported in the semiannual report required by § 63.10(d)(5).
[40 CFR 63.6(e)(1) & 63.6(e)(3)]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.17. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
23	Determination of Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the US EPA. [40 CFR 63.1511(c) and 63.1512(d), Rule 62-204.800, F.A.C., Title V Permit No. 0570119-014-AV and Air Construction Permit No. 0570119-017-AC]

A.18. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.19. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), test the two rotary furnaces and the baghouse exhaust to demonstrate compliance with the emission standard for opacity, and submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. The EPA Method 9 test observation period on the baghouse exhaust shall be a minimum of 30 minutes. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3), 62-297.310(7)(a) and 62-296.712(3), F.A.C., and Permit No. 0570119-013-AC]

A.20. Compliance Tests Prior To Renewal. Compliance tests shall be performed for PM and D/F within 60 days prior to the renewal application submittal date (225 days prior to the expiration date of the permit). The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Conditions A.6. – A.7. Submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. For the EPA Method 23 test, each test run must consist of an entire operating cycle. The testing shall be performed during the period when the furnaces are being charged with and melting the most contaminated aluminum scrap and utilizing the highest chlorinated fluxing rate. The owner or operator should minimize periods of processing and pouring of entirely molten aluminum during the testing. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [40 CFR 63.1511(e), 63.1512(d), Rules 62-210.300(2)(a), 62-296.712(3), and 62-297.310(7)(a), F.A.C.]

A.21. [RESERVED]

A.22. Testing of emissions from the rotary furnaces shall be conducted with the sources operating at capacity. Capacity is defined as 90-100% of rated capacity as listed in Specific Condition A.1., with both furnaces in operation simultaneously (i.e. both furnaces should be charging scrap aluminum at the same time at a rate of 6,000 lbs/hr per furnace). To simulate the worst-case emissions from the source, the scrap aluminum charged during the test should be the most contaminated mixture processed by the furnaces. The most contaminated mixture is comprised of a charge with the highest percentage of foreign material (plastics, oils, etc.) and highest percentage of iron content (engine blocks, transmission casings, etc.) based on material normally stockpiled at the site. Failure to reasonably account for a representative feed of the worst-case scrap may invalidate the tests. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3), 62-296.700(4)(b)2. and 62-297.310, F.A.C.]

A.23. All performance testing for dioxin/furan and shall follow the requirements from Subpart RRR (40 CFR 63.1511). At least 60 days prior to any performance test for dioxin/furan, the owner or operator shall prepare and submit a site-specific test plan which satisfies all of the requirements, and must obtain approval of the plan pursuant to the procedures, set forth in 40 CFR 63.7(c). The site-specific test plan shall specifically identify the intended make-up of the charge to simulate worst-case conditions during the test and provide the methodology for that determination. Following demonstration of compliance, a limiting description of acceptable charge based on the previous test shall be added to the OM&M as an enforceable limitation, pending approval from the EPC. The test shall also establish operating parameters for all future operation including baghouse inlet temperature (Specific Condition A.13.e.), pressure drop across baghouse cells, lime-feeder setting (Specific Condition A.13.f.) and damper temperature set-points.

The D/F test must constitute a minimum of 3 runs and sampling for each run must be conducted over the entire process operating cycle. Since the emissions from both furnaces are exhausted through a common stack, sampling for each run must be conducted over a period of time during which both furnaces complete at least 1 entire process operating cycle. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

{Permitting Note: Based on the HCl emissions compliance test conducted on September 5, 2012, the current minimum lime feed rate is fifty (50) pounds per hour. However, the permittee may establish a different lime feed rate based on the most recent successful HCl or D/F compliance test, whichever is greater.}

[Rule 62-4.070(3), F.A.C., 40 CFR 63.1511 and 63.7]

A.24. The owner or operator of an affected source must notify the EPC in writing of his or her intention to conduct a performance test for dioxin/furan at least 60 calendar days before the performance test. The owner or operator must analyze performance audit (PA) samples during each performance test. The owner or operator must request performance audit materials 30 days prior to the test date. If the EPC fails to provide required PA materials to an owner or operator of an affected source in time to analyze the PA samples during a performance test, the requirement to conduct a PA under this paragraph shall be waived for such source for that performance test. [40 CFR 63.1511 and 63.7(b) & (c)]

Recordkeeping and Reporting Requirements

A.25. In order to demonstrate compliance with Specific Condition No. A.1., the permittee shall maintain daily records of operations for the most recent five years. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but are not limited to, the following:

Daily
a) Month, Day, Year
b) Total aluminum charged to each rotary furnace (lbs)*
c) Total flux charged to each rotary furnace (lbs)
d) Total aluminum alloy produced by each rotary furnace (lbs)
e) Total hours of operation of each rotary furnace (hours)**
f) Average charge rate for each rotary furnace using b) and e) above (lb/hr)*
g) Average production rate for each rotary furnace using d) and e) above (lb/hr)
h) Natural gas usage (cubic feet) and daily average heat input rate (MMBtu/hr) per rotary furnace

Monthly
i) Total aluminum charged to each rotary furnace (tons)*
j) Total flux charged to each rotary furnace (tons)
k) Total aluminum alloy produced by each rotary furnace (tons)
l) Total hours of operation of each rotary furnace (hours)**
m) Average charge rate for each rotary furnace using i) and l) above (lb/hr)*
n) Average production rate for each rotary furnace using k) and l) above (lb/hr)
o) Total natural gas usage per rotary furnace (cubic feet)
p) Running 12-month total of i), k), l) and o) above

* - Once a correlation between the charge rate and the production rate is established during the compliance tests, recordkeeping compliance may be determined entirely by production data.
** - Hours of operation in e) and k) shall only include hours that the units were actively processing aluminum.

Daily log sheets of the processing of aluminum scrap to each furnace, including times, are also required. These log sheets are not specified as part of specific reporting requirements, but must be available upon request to support the daily summary sheets noted above.
[Rules 62-4.070(3), 62-296.320 and 62-296.700, F.A.C., 40 CFR 63.1506(d)(3) and 63.1517]

A.26. The permittee shall not make any physical changes related to the capture and collection system without the approval of EPC staff, with the exception of any required maintenance on the system. All captured emissions from the furnaces must vent 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. The

capture/collection system shall be operated according to the procedures and requirements in the OM&M Plan, with each capture/collection and closed vent system inspected at least once each calendar year along with records of the results of each inspection. The control system, specifically the damper operation, shall be operated in the same manner as demonstrated during the face velocity test dated November 9, 2004. The dampers should remain closed unless triggered by a temperature indicator.
[Consent Order (EPC Case #: 04-0804DL0119) dated January 12, 2005, 40 CFR 63.1506(c) and 63.1510(d)]

A.27. The owner or operator must maintain operation of a device that measures and records the reference values for weights of feed/charge and operate each weight measurement system in accordance with the OM&M Plan, specifically that the calibration schedule (annually) is maintained and the accuracy of the weight measurement device is within ±1 percent of the weight being measured. Production weight averaging based on the common sizes of poured molds must be periodically checked through use of these scales. [Rule 62-4.070(3), F.A.C., 40 CFR 63.1506(d) and 63.1510(e)]

A.28. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Notification of Compliance Status	Within 60 days of completion of relevant compliance testing.	A.30.
Semiannual Reports	Within 60 days of each 6-month period.	A.31.

[Rule 62-213.440, F.A.C.]

A.29. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.30. A notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration performance test. [40 CFR 63.1515(b) and 63.9(h)]

A.31. The owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). 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 detailed report must be submitted if any of the following occurs within the 6-month reporting period: [40 CFR 63.1516(b)]

a. The corrective action specified in the OM&M Plan for a bag leak detection system alarm was not initiated within 1 hour.
b. An excursion of a compliant process or operating parameter value or range (*e.g.*, fabric filter inlet temperature, total metal processed, definition of acceptable scrap, lime feed rate, etc.).
c. 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).
d. An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of 40 CFR 63, Subpart RRR.

A.32. All records, reports and notifications required by this permit and 40 CFR 63, Subpart RRR shall be retained for at least 5 years following the date of each event. In addition, the permittee must maintain the following records: [40 CFR 63.1517(a) & (b) and 40 CFR 63.10(b)(2)]

a. Regarding the bag leak detection system, the number of total operating hours for the affected source or emission unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time

corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

b. Records of 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the 3-hour block average temperature exceeds the compliant operating parameter value +14 °C (+25 °F), with a brief explanation of the cause of the excursion and the corrective action taken.

c. Records of inspections at least once every 12-hour period verifying that lime is present in the silo, flowing consistently and that the feeder setting is consistent with the performance test. Records should include any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 6-hour period for the subsequent 3 days. Records of any deviation of the feeder setting from the setting used in the performance test should be maintained, with a brief explanation of the cause of the deviation and the corrective action taken. Any gauges present to document silo levels and/or flow-rate should be recorded with the inspections.

d. For the rotary furnaces, which are subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights and times for each operating cycle.

e. Records of monthly inspections for proper unit labeling.

f. Records of annual inspections of emission capture/collection and closed vent systems.

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

(i) Startup, Shutdown, and Malfunction Plan;

(ii) OM&M Plan

h. Records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced.

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

j. All information necessary to demonstrate conformance with the affected source's Startup, Shutdown, and Malfunction Plan.

k. All results of performance tests and visible emission observations.

Other Requirements

A.33. The permittee must provide and maintain easily visible labels posted at each rotary furnace that identifies the applicable emission limits and means of compliance, including the applicable operational standard and control method (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 additional practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M Plan. The labels must be inspected at least once per month to confirm that posted labels are intact and legible. [40 CFR 63.1506(b) and 63.1510(c)]

A.34. The permittee shall install a natural gas meter at each rotary furnace, and measure and record the pressure drop across the gas and air orifices on the rotary furnace burners on an annual basis and compare the readings with the manufacturer's specifications, to ensure that the heat input rates do not exceed 6.0 MMBtu/hr, or a higher rate not to exceed 7.5 MMBtu/hr, as stipulated in Specific Condition A.1. These records shall be kept on site and made available for inspection by a duly authorized Federal, State, or Local agency, upon request. [Rules 62-4.070(3) and Air Construction Permit No. 0570119-017-AC]

A.35. Federal Rule Requirements. In addition to the specific conditions listed above, these emission units are subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart RRR. [Rule 62-204.800, F.A.C.]

Subsection B. Emission Unit 004

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
-004	Aluminum Holding Furnace

On-site is a 6 MMBtu/hr aluminum holding furnace which processes only *clean charge* (as defined by 40 CFR 63.1503) aluminum scrap and aluminum from the rotary furnaces at a maximum rate of 7,000 lbs/hr. The holding furnace holds and keeps the aluminum from the rotary furnaces in a molten state prior to casting into deox, sows, etc. The holding furnace can also be used to melt sows cast from the rotary furnaces, as needed for operational flexibility. The aluminum holding furnace is a equipped with a charging well which is used to receive molten aluminum via transfer kettle/ladle (up to 14,000 lbs capacity) directly into the holding furnace. The charging well is lined with refractory brick to keep the molten aluminum hot during transfer operations.

Previously associated with the holding furnace was an aluminum sweat furnace, an Al-Jon United Model AS-990-R-20 furnace with dual chambers. Since this sweat furnace has not been operated since 1999, a separate air construction permit application is required prior to start-up. The sweat furnace must comply with all requirements of the NESHAP (Subpart RRR) prior to any resumption of operation.

The aluminum holding furnace is also subject to the Secondary Aluminum NESHAP (40 CFR 63 Subpart RRR) and is identified as a *Group 2* furnace. No reactive flux is allowed in processing of clean charge in the holding furnace. Emissions from the holding furnace vent directly to the atmosphere.

This emission unit is exempt from PM RACT, since the PM PTE's are less than 1 tpy. This emission unit shall comply with all of the requirements of the NESHAP including notifications, required operation plans, and required performance testing, as applicable.

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum allowable permitted capacities are as follows:

EU No.	MMBtu/hr Heat Input	Charging Rate (lb/hr)[1]	Charging Rate (tpy)	Fuel Type
004	6	7,000	30,660	Natural Gas

[1]Based on a daily average.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), and, Permit No. 0570119-016-AC]

B.2. Methods of Operation.

a. *Fuel*. The only fuel that is allowed to be burned in this unit is:
   (1) Natural gas
b. Only clean charge shall be processed in the aluminum holding furnace.
c. No reactive HAP-containing/HAP-generating fluxes may be used in the holding furnace. Only clean charge feed shall be fed into the holding furnace.
d. The holding furnace shall be operated in accordance with the OM&M Plan pursuant to 40 CFR 63 Subpart RRR, which is attached to this permit.

[40 CFR 63.1506(o), Rules 62-213.410 and 62-4.070(3), F.A.C.; and, Permit No. 0570119-016-AC]

B.3. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).
[Rule 62-210.200(PTE), F.A.C., Permit No. 0570119-016-AC]

B.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.5. Visible Emissions. Visible emissions from the aluminum holding furnace shall not exceed 20% opacity. [Rule 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.6. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.7. Test the aluminum holding furnace for visible emissions annually and submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. The EPA Method 9 test observation period on the holding furnace exhaust shall be at least 30 minutes in duration. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-4.070(3) and 62-297.310(7)(a), F.A.C.]

B.8. Compliance with the emission limitation for visible emissions shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-297, F.A.C.]

B.9. Testing of emissions for the holding furnace shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity as listed in Specific Condition B.1. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310, F.A.C.]

Recordkeeping and Reporting Requirements

B.10. In order to demonstrate compliance with Specific Condition No. B.1., the permittee shall maintain daily records of operations for the most recent five years. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but are not limited to, the following:

Daily
a) Month, Day, Year
b) Total aluminum charged to the holding furnace (lbs)
c) Total flux charged to the holding furnace (lbs)
d) Total aluminum alloy produced by the holding furnace (lbs)
e) Total hours of operation of the holding furnace (hours)
f) Average charging rate for the holding furnace using b) and e) above (lb/hr)

Monthly
g) Total aluminum charged to the holding furnace (tons)
h) Total flux charged to the holding furnace (tons)
i) Total aluminum alloy produced by the holding furnace (tons)
j) Total hours of operation of the holding furnace (hours)
k) Average charge rate for the holding furnace using g) and j) above (lb/hr)
l) Amount of natural gas used in the holding furnace (MMCF)
m) Running 12-month total of g), i), and l) above

[Rules 62-4.070(3) and 62-296.320, F.A.C., 40 CFR 63.1517(b)(12)]

B.11. The permittee must provide and maintain easily visible labels posted at the holding furnace that identifies the applicable emission limits and means of compliance, including the applicable operational standard and control method (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 additional practices, the applicable operating parameter ranges and requirements as incorporated in the OM&M Plan. The labels must be inspected at least once per month to confirm that posted labels are intact and legible.
[Rule 62-4.070(3), F.A.C., 40 CFR 63.1506(b) and 63.1510(c)]

B.12. The owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). 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. For the holding furnace, the Responsible Official must submit a certification statement stating that only clean charge materials were processed in the group 2 furnace during the 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 the reporting period. The Responsible Official shall also indicate whether or not the holding furnace was operated according to the requirements of 40 CFR 63, Subpart RRR. A detailed report of any deviations from the applicable requirements must be submitted for each 6-month reporting period. [40 CFR 63.1516(b)(2)(v)]

B.13. Federal Rule Requirements. In addition to the specific conditions listed above, the aluminum holding furnace is subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart RRR. [Rule 62-204.800, F.A.C.]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix OM&M, Operation, Maintenance, and Monitoring Plan
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, Subpart A – General Provisions.
Appendix NESHAP, Subpart RRR.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Table H, Permit History
Table 1, Summary of Air Pollutant Standards and Terms
Table 2, Compliance Requirements
Operation, Maintenance & Monitoring (OM&M) Plan (Revised January 2014)