HYDRO

Hydro Aluminum North America
200 Riviera Blvd.
St. Augustine, FL 32086

Operation, Maintenance and Monitoring (OM&M) Plan,

Including Site-Specific Monitoring Plan

National Emissions Standards for Hazardous Air Pollutants

for

Secondary Aluminum Processing Unit

40 CFR Part 63 Subpart RRR

Revision;
December 2011

HYDRO

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1.0 Introduction

Hydro Aluminum North America, Inc. (HANA) operates a secondary aluminum facility in St. Augustine, Florida (the "Facility") that is subject to certain provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum facilities, promulgated at 40 CFR Part 63, Subpart RRR - ("Subpart RRR"). Section 63.1510(b) of Subpart RRR governs the development and implementation of an Operation, Maintenance and Monitoring (OM&M) Plan for affected sources.

This document constitutes HANA's updated OM&M Plan for the Facility. This plan also constitutes and includes the Site-Specific Monitoring Plan for the Facility, in accordance with Section 63.1510(a)(i). This OM&M Plan, including the required elements of a Site-Specific Monitoring Plan, will be referred to throughout this document simply as the OM&M Plan.

1.1 Purpose and Scope

The OM&M Plan identifies procedures for the proper operation and maintenance of equipment subject to Subpart RRR. It also describes a program of monitoring process parameters and corrective actions to be taken when monitored parameters deviate from their acceptable ranges. The purpose of the OM&M Plan is to:

- ensure that affected sources are maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions;
- identify operating levels or ranges for process devices established during performance testing;
- describe procedures to monitor process parameters; and
- ensure that deviations from accepted parameter values or ranges will be corrected as soon as practicable after the occurrence in order to minimize excess emissions.

The following information related to relevant work practices and pollution prevention measures is included in the OM&M Plan.

- Operating parameters to be monitored to demonstrate compliance, as applicable, with relevant provisions of Subpart RRR, and established operating levels or ranges, as applicable, for the affected process.
- A monitoring plan for the affected source/emission unit.
- Procedures for the proper operation and maintenance of each affected process unit, to the extent subject to the applicable emission limits or standards.
- Procedures for the proper operation and maintenance of monitoring device(s).
- Procedures, including relevant recordkeeping, for corrective action to be taken if the monitored value of a relevant parameter deviates from the established value or range.
- A maintenance schedule for each affected process device.

1.2 Facility Description

Specific facility information is identified in the following table.

Primary Industrial Activity:	Aluminum casting and extrusions SIC Code: 3341
Owner/Operator:	Hydro Aluminum North America, Inc.
County and State: Latitude/Longitude:	St. Johns County, Florida 29° 45' 34" / 81° 18' 35"
Mailing Address:	Hydro Aluminum North America 200 Riviera Blvd. St. Augustine, FL 32086 (904) 794-1500

The Facility is properly classified as an area source of hazardous air pollutants ("HAPs") as defined in §63.2 because it emits or has the potential to emit less than ten (10) tons per year of a single HAP and less than 25 tons per year, in the aggregate, of all HAPs.

1.3 Source Identification

HANA operates under the following Florida Department of Environmental Protection Permit Nos. 1090447-011-AV.

Applicable source(s) identified in the current permit and Subpart RRR as affected sources, and therefore subject to the OM&M Plan, are identified in Table 1-1. These sources comprise the Secondary Aluminum Processing Unit at the Facility. However, only Remelt Furnace No. 2 (EU004) processes material that does not meet the definition of clean charge; therefore, only that unit is subject to emission limits under Subpart RRR. In addition, because the Facility qualifies as an area source of HAPs, Remelt Furnace No. 2 (EU004) is subject only to the emission limitations for dioxin/furan under Subpart RRR. Further, as recently confirmed by performance testing in January 2011, Remelt Furnace No. 2 (EU004) complies with the dioxin/furan emission limitations under Subpart RRR without reliance upon any air emission control device. Therefore, although HANA operates a polishing scrubber to provide enhanced particulate and opacity control for emissions from Remelt Furnace No. 2 (EU004), consistent with the air quality permit for the Facility, Remelt Furnace No. 2 (EU004) qualifies under Subpart RRR as a Group 1 Furnace without add-on control device, when other than clean charge is charged to the furnace. If only clean charge is charged to the furnace, Remelt Furnace No. 2 (EU004) qualifies as a Group 2 Furnace under Subpart RRR.

Table 1-1 List of Affected Sources

Source	Description
E.U. ID No. 004 Remelt Furnace No. 2 (EU004)	Group 1 Furnace without add-on control device, or Group 2 Furnace (depending on specific operating conditions) No Reactive Fluxing Performed
E.U. ID No. 003 Remelt Furnace No. 1 HANA operates this unit as a Holding Furnace	Group 2 Furnace Clean Charge Only (Molten Aluminum and alloys) No Reactive Fluxing Performed
E.U. ID No. 010 SIR Unit as an In-Line Fluxer	In-Line Fluxer using nonreactive, non-HAP containing/non HAP generating gases or agents

2.0 Operation and Monitoring

The Facility operates and monitors the affected sources according to the following procedures, which satisfy applicable requirements of Subpart RRR.

2.1 Operating Limit Summary

The affected source is operated in accordance with the parameter values or ranges established during the most recent performance test, or relevant limits identified in the facility permit. The units and parameters are summarized in Tables 2-1, 2-2 and 2-3.

Table 2-1 Operating Summary E.U. No. 004

Process Equipment	Parameter Measured/Monitored	Acceptable Range/Limit	Method/ Frequency
E.U. ID No. 004 Remelt Furnace No. 2	Feed/Charge Weight (all charge materials – clean charge and non-clean charge*)	30 tons/batch; 80,000 tons/year	Weighed by calibrated scale; per batch rolling 12-month
	Feed/Charge Material	Permitted at 35% aluminum that does not meet the definition of clean charge under Subpart RRR Remaining 65% (minimum) of charged materials must meet the definition of clean charge under Subpart RRR.	Weighed by calibrated scale; Visual evaluation of material; segregation of non-clean charge; established programs with primary suppliers; per batch

* non-clean charge is defined in this plan as all materials not meeting the Subpart RRR definition of clean charge.

These operating parameters are consistent with operating conditions for the Remelt Furnace during performance testing when emissions complied with applicable emission standards for dioxins and furans ("D/F"). The D/F emission standard of 15 μg of D/F TEQ per Mg (2.1×10^{-4}gr of D/F TEQ per ton) of feed/charge is established for Remelt Furnace No. 2 (EU ID No. 004) under Subpart RRR and imposed upon the Facility through the permit. The operating ranges were established for the relevant equipment during the most recent stack testing, which demonstrated compliance with this D/F emission limit.

Table 2-2 Operating Summary E.U. No. 003

Process Equipment	Parameter Measured/Monitored	Acceptable Range/Limit	Method/ Frequency
E.U. ID No. 003 Remelt Furnace No. 1 (HANA operates this unit as a Holding Furnace)	Feed/Charge Weight (all charge materials – consisting of clean charge only)	The Holding Furnace operates in series with Remelt Furnace No. 2 (EU ID No. 004), and does not operate independently. Therefore, the feed/charge rate of the Holding Furnace is assumed to be the same or less than Remelt Furnace No. 2 (EU004).	
	Feed/Charge Material	100% Clean Charge No reactive fluxing allowed	

Table 2-3 Operating Summary E.U. No. 010

Process Equipment	Parameter Measured/Monitored	Acceptable Range/Limit	Method/ Frequency
E.U. ID No. 010 In-line Fluxer	Type of Flux material	nonreactive, non-HAP containing/non HAP generating gases or agents	Maintain record of flux material used in the in-line fluxer. Maintain label on fluxer to limit fluxing agent to non-reactive materials.

2.2 Feed/Charge Weight

A platform scale is utilized to measure and record the total weight of feed/charge to the remelt furnace. The charge type (clean or non-clean charge), weight, and scrap percent is recorded and maintained per batch. The platform scale is cleaned and spot checked on a recurrent basis, as needed. The scale is operated in accordance with the manufacturer's instructions and recommendations. Calibration and routine maintenance are performed at least once every six months to ensure that the scale is calibrated and accurately weighs the load within ±1 percent of the weight being measured.

If, during observations of scale operation, Facility representatives observe that the scale is no longer functioning, or obviously is not accurately functioning, then the Facility will investigate whether the scale can be repaired or recalibrated. If the scale cannot be repaired or recalibrated, the Facility will replace the scale. The Facility will not charge the remelt furnace with clean or non-clean charge that has not been weighed.

2.3 Scrap Contamination Monitoring

The calculation method specified in Section 63.1510(q) of Subpart RRR is used to demonstrate compliance with the maximum allowable charge rate for non-clean charge, in lieu of demonstrating compliance based on the scrap inspection program contained in 63.1510 (p). The following procedures are followed in order to regulate the quantity and character of non-clean charge charged to the remelt furnace.

HANA maintains standard purchase agreements with several outside suppliers of scrap aluminum. The agreement with each supplier is based on internal policies for selection criteria, per ISO 9001 quality standards, that designate a supplier as an "approved" vendor. Approved vendors are contractually required to deliver scrap aluminum that meets the specifications in Appendix B. HANA personnel also visually observe incoming scrap loads for conformance with the vendor specifications.

HANA applied these same specifications and procedures to the aluminum scrap processed at the Facility during the most recent performance testing of the furnace to demonstrate compliance with the D/F emission limits under Subpart RRR. HANA therefore ensures that operating conditions for the source are consistent with the conditions observed during the compliant performance testing.

These procedures, coupled with weighing of material using the calibrated scale, ensure that the relative quantity of non-clean charge does not exceed 35%.

Following segregation of the scrap and separate weighing of clean and non-clean charge using the calibrated scale, HANA calculates the relative scrap content of non-clean material charged to the furnace, according to the following formula:

$$\text{Non-clean Charge (\%)} = \frac{\text{Non – Clean Charge (lb)}}{\text{Total Charge (lb)}}$$

Where, Non-Clean Charge is defined as all materials not meeting the Subpart RRR definition of clean charge, and Total Charge is the sum of all charge materials

2.4 Unit Labeling

In accordance with Section 63.1506(b), the Facility has provided and maintains easily visible labels, posted at Remelt Furnace No. 2 (EU004), as a Group 1 Furnace without add-on control device, Remelt Furnace No. 1, as a Group 2 Furnace, and the in-line fluxer. Each label identifies the type of affected source and applicable operational standards. In particular, the label for the in-line fluxer confirms that no reactive fluxing agents may be used in the in-line fluxer, the label for Remelt Furnace No. 1 identifies that only clean charge may be charged to the furnace, and the label for Remelt Furnace No. 2 (EU004) identifies that the maximum quantity of non-clean charge that may be charged to the furnace is 35% of the total charge for the batch. Both labels for the two furnaces also identify the maximum charge rate for each batch.

In accordance with Section 63.1510(c), the labels are inspected each month to confirm that they remain intact and legible. A log is kept of these monthly inspections.

3.0 Maintenance

The equipment at the Facility that is part of the operation of each affected process unit is maintained in accordance with preventative maintenance procedures. The preventative maintenance procedures are maintained at the Facility, and are periodically reviewed and updated, as necessary. Non-routine maintenance is performed as required to maintain proper and effective operation of the furnaces and in-line fluxer. Maintenance records are kept onsite.

4.0 Corrective Action

Corrective action will be initiated if an established operating parameter deviates from the value or range established based on compliance demonstrated during the performance test. Corrective action will restore operation of the affected source to its normal mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective action taken will include follow-up actions necessary to return the process to the value or range of values established during the performance test and take steps to prevent the likely recurrence of the cause of a deviation. Corrective action practices and procedures will be used to correct problems that could result in greater than normal emissions from the covered processes.

4.1 Corrective Action Procedures

Corrective action procedures will be performed when a process parameter deviates from the value or range established during the performance test.

4.2 Corrective Actions

The following table identifies events that may occur during operation of the Facility that may warrant corrective actions under Subpart RRR, as well as a corresponding series of corrective action procedures.

Table 4-1
Corrective Actions

Source	Deviation Event	Procedures
E.U. ID No. 004 Remelt Furnace No. 2	**Feed/Charge Weight Exceeds:** 30 tons/batch;	• Complete the batch* • Retrain relevant operators relative to the operational standard
E.U. ID No. 004 Remelt Furnace No. 2	**Feed/Charge Weight Exceeds:** 80,000 ton/year	• Complete the batch* • Retrain relevant operators relative to the operational standard
E.U. ID No. 004 Remelt Furnace No. 2	**Feed/Charge Material Exceeds:** (Permitted 35% non-clean charge maximum of total mixture)	• Complete the batch* • Retrain relevant operators relative to the operational standard
E.U. ID No. 004 Remelt Furnace No. 2	**Scale inoperable** **Scale operating improperly**	• Investigate whether the scale can be repaired or recalibrated. • If the scale cannot be repaired or recalibrated, install a new scale. • The Facility will not charge the remelt furnace with clean or non-clean charge that has not been weighed.

Source	Deviation Event	Procedures
E.U. ID No. 003 Remelt Furnace No. 1 (HANA operates this unit as a Holding Furnace)	**Feed/Charge Different from:** Clean charge only No reactive fluxing (Group 2 Furnace per 40 CFR 63 Subpart RRR)	• Complete the batch* • Retrain relevant operators relative to the operational standard

Source	Deviation Event	Procedures
E.U. ID No. 010 In-line Fluxer	**Feed/Charge Different from:** No reactive fluxing	• Complete the batch* • Retrain relevant operators relative to the operational standard

* In the event of a deviation of an operating standard, the operators will complete the current batch cycle to reduce the probability of elevated emissions potentially associated with an unplanned shutdown of the process equipment.

5.0 Records and Reporting

Applicable records, logs, reports and/or notifications pertaining to operating, maintenance and monitoring are maintained at the Facility for at least five (5) years. The Facility maintains records of the parameters measured during the most recent performance test. Records are maintained of each scale calibration and each scrap weight on a per bath basis for a period of five years. The Facility also maintains records of the operating parameters listed, and recorded at the frequencies established, in Tables 2.1, 2.2 and 2.3.

In addition, records kept at the Facility include:

- corrective actions to restore operating parameter values or ranges to normal mode of operation;
- information necessary to demonstrate conformance with the OM&M;
- the total process operating time during the reporting period (semi-annually, annually);
- the charge/feed weights for each operating batch;
- total aluminum production for each rolling 12-month period;
- records of monthly inspections for proper unit labeling;
- records of scale calibrations;
- current copies of required plans, including any revisions; and
- records of flux materials utilized in in-line fluxer, to demonstrate that non-reactive flux is used in the in-line fluxer.

5.1 Periodic Reports

Corrective action taken during an operating, maintenance or monitoring event will be recorded on a Corrective Action Report Form (provided in Appendix A). The Corrective Action Report consists of the action taken, the duration of the event, and a brief description of the event and will identify the name, title, and signature of the responsible official who is certifying accuracy.

Semi-annual reports will be submitted within 60 days following the end of each calendar half. The Corrective Action Report will be documented and reported in the semiannual report. Any revision to the OM&M plan will also be reported in the semi-annual report required by 63.10(d)(5). The semi-annual report will also include certifications reflecting that only clean charge materials were processed in the Group 2 Furnace(s) during the reporting period, and that no fluxing was performed or that all fluxing performed within the Furnace was conducted using only nonreactive-non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes; as well as a certification that only nonreactive-non-HAP-containing, non-HAP-generating flux gases, agents or materials were utilized at anytime during the reporting period within the in-line fluxer.

5.2 Plan Modification and Revisions

Modifications may be made to the OM&M Plan as necessary to satisfy the requirement of the rule or to reflect changes in equipment at the affected source. In addition, to the extent that HANA determines that modifications to the OM&M Plan are appropriate to address any changes involving individual equipment or changes in procedures, operating parameters or other relevant factors, then the Facility will prepare a revision to the OM&M Plan.

Certain modifications to the OM&M Plan may be made without prior approval from the Administrator or the permitting authority unless specifically provided otherwise by the permitting authority. However, revisions of

OM&M Plan typically will not become effective until the Facility submits a description of the changes and a revised plan incorporating them to the permitting authority.

6.0 Certification Statement

I have reviewed this Operation, Maintenance and Monitoring Plan in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this plan are true, accurate, and complete, and the Plan satisfies all requirements of 40 C.F.R. §63.1510(b) and is otherwise consistent with the requirements of Subpart RRR. Based on the information provided in this plan Hydro Aluminum North America, Inc. has complied with the relevant standard(s).

BOB GREGORY ON BEHALF OF ALLAN ANNIS

Name of Responsible Official

PLANT MGR.

Title of Responsible Official

Signature of Responsible Official

ON BEHALF OF ALLAN ANNIS

12/21/2011

Date

APPENDIX A
CORRECTIVE ACTION FORM

Date:

Type of Event (Select one):

Melter (Charge > 30 ton / 60,000lbs)

Melter (Charge > 35% painted scrap)

Melter (Scale malfunction / inoperable)

Holder (Charge > 30 ton / 60,000lbs)

Holder (Feed any material other than clean charge)

Other

_____

Suspected Cause:

Corrective Actions Taken:

Please provide recommendations or suggestions for actions to be taken in future, similar events:

Your Name: _____ Signature: _____

Supervisor Comments:

Supervisor: _____ Signature: _____

APPENDIX B
Aluminum Scrap Specifications

HYDRO

Aluminum Scrap Specifications

December 2011

Document No.:
Revision Date: December 13, 2011

Aluminum Scrap Specifications

1. Specification Requirements:

Prior to the purchase of scrap material, the supplier must accept this specification in writing and return to Hydro Aluminum – Materials Manager. Any deviation must be approved in writing by Hydro Aluminum, ENA

2. Physical and Package Requirements:

2.1. Painted scrap will be accepted only if it meets the applicable requirements of this Specification and any more specific requirements for painted scrap specified in the HYDRO ALUMINUM purchase agreement.

2.2. All packaged material must be inspected by the supplier's personnel prior to shipment to ensure material and packaging is in accordance with specifications. Each bale, box or bundle must be tagged with gross, tare and net weights, product description (such as the scrap material types listed in Section 3), and ship location identifier.

2.3. Baled material is acceptable. No shrink/plastic wrapping will be accepted. Densified or briquetued scrap must be approved prior to delivery.

2.4. No powder residues will be accepted. These include any powders, granules, films, residues that may contain nitrates, sulfates, oxidizers, fertilizers and others salts.

2.5. No water, snow, ice and moisture bearing oxides, soil or dirt found on scrap surface and inside bale or box will be accepted.

2.6. No crimped tubing or pipe will be accepted.

2.7. No volatile substances or hydrocarbon materials will be accepted. This includes alcohol containers, oils, grease, plastics, and cleaning fluids.

2.8. No CLOSED CONTAINERS (CANS & BOTTLES) will be accepted. This includes aluminum drink cans, bottles, aerosol cans, automotives air bag cartridges, UBC (used beverage containers), food containers, radiators, heat exchangers, sealed pressurized containers, ammunition and explosive detonators, crimped or closed tubing.

2.9. No aluminum fines, powders, pigments, granules or very fine chips will be accepted.

2.10. No wood, paper, cardboard, plastics, and rubbers.

2.11. No heavy oxidized or corroded aluminum scrap will be accepted.

2.12. No PCB (polychlorinated biphenyls) or PCB - contaminated oils will be accepted.

2.13. No heavy metals will be accepted. These include: Lead(Pb), Bismuth(Bi), Cadmium(Cd), Selenium(Se), Mercury(Hg). Large photocopier image transfer tubes may contain selenium and therefore will not be accepted.

2.14. No bio-hazardous and medical waste including hypodermic needles, medical and hospital waste will be accepted.

2.15. No radioactive materials will be accepted. This includes any material coming from X-ray equipment and other nuclear medicine scrap equipment.

2.16. No Aluminum-Lithium alloy scrap will be accepted.

2.17. **Loose scrap:**

2.17.1. Maximum length of loose material is 6' or as specified by the Hydro purchase order.

2.17.2. No saw chips, turnings or punchings will be accepted.

2.18. **Bundled Scrap**

2.18.1. Maximum bundle Dimensions:

length: 6 feet
height: 3 feet
width: 3 1/2 feet

2.18.2. Bundles must be strapped to insure package integrity during unloading and charging. Strapping material must be agreed to between the parties prior to delivery.

2.18.3. No steel strapping inside a bundle.

2.18.4. Bundles on a flatbed trailer must be packaged and loaded in order to be forklift unloadable.

2.19. **Boxes**

2.19.1. Boxed scrap is limited to 2 boxes per shipment without prior approval from Hydro Materials Manager.

2.19.2. Boxes must be on pallets allowing for forklift off loading.

2.19.3. Boxes must be dry and free from residues or other metallic contamination.

3. Scrap Material Definitions

In addition to satisfying all specifications in Section 2, the following materials must also satisfy these additional criteria:

3.1. **New Production Press Scrap**
Material shall consist of new production scrap of a single alloy, typically 6061 or 6063. Material must contain "butt ends" and be scrap generated directly from the extrusion process.

3.2. **New Bare Extrusion Scrap**
Material must be new production, segregated, single alloy, typically 6063, 6061, or 6105 alloy, extrusion scrap. Anodized material is acceptable. Vinyl, plastic,(thermal fill), or other coatings are not allowed.

3.3. **New Production Painted 6063 alloy scrap:**
Material shall consist of clean, new production, alloy 6063 extrusion scrap, painted on one or both sides. Must be free of vinyl or plastic coating, felt, caulking, corrosion, fiber backboard, screens, or other types of foreign contamination.

3.4. **Dealer 6063 Painted extrusion scrap**
Material shall consist of clean, alloy 6063 extrusion scrap, painted on one or both sides. Must be free of iron, zinc, or other metallic content. Vinyl or plastic coating, felt, caulking, corrosion, fiber backboard, screens, or other types of foreign contamination are not allowed.

3.5. **Dealer 6061 Extrusion Scrap**
Material shall consist of clean, alloy 6061 extrusion scrap. Anodized material is acceptable. Must be free of iron, zinc, or other metallic content. No 6061 plate or sheet is acceptable. Vinyl or plastic coating, felt, caulking, corrosion, fiber backboard, screens, or other types of foreign contamination are not allowed.

3.6. **E.C. Aluminum**
Material shall consist of a single 1350 alloy. Material must be free from any coatings or residues, enameled wire, copper wire or ACSR wire. Hair-wire or scrap of minus 20 mesh is not acceptable. Must contain 99.45% aluminum. EC Straws or nodules are acceptable and must meet the same requirements. Size and density of EC straws must be approved prior to shipment.

4. Deviations

4.1. Failure in meeting the specification requirements as listed can result in Safety, Production and Quality issues for the HYDRO ALUMINUM Facility.

4.2. HYDRO ALUMINUM will reject any scrap load that it determines does not meet these specification requirements in any material respect. In the event that HYDRO ALUMINUM does not reject any scrap load deviating from this specification because such deviation is not identified or for any other reason, HYDRO ALUMINUM does not thereby waive its right to reject any future scrap load exhibiting similar or other off-specification characteristics, such right being expressly reserved. Any additional costs associated with the rejection will be the responsibility of the supplier. Physical specifications not specifically addressed in this document must be approved by HYDRO ALUMINUM Remelt prior to shipment.

5. Shipping & Receiving Procedures:

Receiving Hours:

5.1. Supplier is to call Hydro Aluminum Remelt in advance to receive a delivery appointment.

5.2. Normal plant specific receiving hours are 7am – 2pm. Call plant for specific receiving times.

6. Weights:

6.1. All trucks must be weighed prior to and after unloading of material. Weighing should be done on plant certified scales.

6.2. If the plant scale weight differs from the stated ship weight, on the Bill of Lading, by more than 0.5% but less than 2%, the plant scale will be used as the pay weight. If the discrepancy is more than 2%, the vendor will be notified immediately to determine a resolution.

7. Contract Due Dates:

7.1. All material must be delivered by the due date on the purchase contract unless otherwise authorized by Hydro Aluminum. Contracts that are not filled by the contract date are subject to penalties including, but not limited to, renegotiation or cancellation.

8. Contract Tolerances:

8.1. Delivered quantities must be within 10% of the contracted volume. Quantities delivered more or less than the acceptable tolerance by the contract due date are subject to renegotiation or cancellation at Hydro Remelt's discretion.

9. Paperwork:

9.1. The following documentation is required with each purchased scrap shipment. Bill of Lading, showing Hydro Aluminum purchase order number, commodity description, including alloy, piece count (if applicable), gross, tare and net weight. A signed bill of lading will confirm delivery.

9.2. All orders are subject to the terms and conditions of Hydro Aluminum purchase order and these specifications. All required paperwork must accompany shipment, including packing list.

9.3. Shipments must arrive with proper paper work including, Purchase Order Number, clear description of material and packing list showing gross, tare and net weight for each package type. Scrap companies with several shipping locations must show the specific ship location on the Bill of Lading. **Deliveries that do not have proper paperwork will be rejected.** In the event that HYDRO ALUMINUM does not for any reason reject any scrap load that does not have proper paperwork, HYDRO ALUMINUM does not thereby waive its right to reject any future scrap load that does not have proper paperwork, such right being expressly reserved.

Seller has executed this Agreement by their respective duly authorized representatives as of the date written below.

COMPANY: _____

By: _____

Printed: _____

Title: _____

Dated: _____