Appendix CP - Compliance Plan

Trademark Metals Recycling, LLC operates a Secondary Aluminum Production Plant in Tampa, FL. The facility must comply with 40 CFR 63 Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production which, among other things, requires renewal testing for HCl for facilities that are major sources of HCl. In accordance with Specific Condition No. A.7. of the previous operating permit (Permit No. 0570119-012-AV), the facility was prohibited from using of any HAP generating fluxes. During the permit review, EPC staff learned that the facility uses a variety of fluxes to make different types of aluminum alloys, and these fluxes have chlorine and generate HCl emissions under high temperature. Therefore, in order to determine if the facility is a major source of HCl, included in this permit is Specific Condition No. A.21., which requires that the facility conduct initial HCl compliance testing in accordance with this Compliance Plan.

Compliance Measures	Compliance Date
1. The owner or operator shall perform an initial compliance test for HCl emissions. The test method shall be EPA Method 26A[1], as described in 40 CFR 60, Appendix A, adopted by reference in Rule 62-204.800, F.A.C. For the EPA Method 26A test, the owner or operator must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system while simultaneously testing the baghouse exhaust for HCl to demonstrate compliance with the 90% reduction standard (for major sources). The HCl test shall be performed during the period when the furnaces are being charged with 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. [1]Or an alternative test method subject to approval by US EPA under 40 CFR 63 Subpart RRR, 63.1511(d). TMR shall copy the EPCHC on any correspondence with EPA regarding approval of an alternative test method.	Within 120 days of issuance of the FINAL Title V Permit No. 0570119-014-AV.
2. The owner or operator shall prepare a site-specific test plan which satisfies all of the requirements of Subpart RRR, 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 and fluxing agents/additives to simulate worst-case conditions during the test and provide the methodology for that determination.	At least 60 days prior to the performance test for HCl.
3. Submit two copies of test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County, along with calculations estimating the HCl potential-to-emit for the facility in accordance with Rule 62-210.370, F.A.C.	Within 45 days of completion of testing.
4. The permittee shall submit a permit application to the EPC for a concurrent AC/Title V revision, if the potential HCl emissions are determined to be greater than 10 tons per year, based on the results of the test. This application shall include a revised OM&M Plan, which includes a limiting description of acceptable charge based on the HCl test as an enforceable limitation. The test shall also establish operating parameters, pending EPC approval, 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.	Within 120 days of the completion of the HCl testing.