Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

October 14, 2011 OCD-AP-037

Electronically Sent- Received Receipt Requested
mf@benada.com

Mr. Monte Friedkin, President
Benada Aluminum Products, LLC
2540 Jewett Lane
Sanford, FL 32771

SUBJECT: Seminole County – AP
Project No. 1170027-010-AF
Compliance Assistance Inspection

Dear Mr. Friedkin:

We met with your staff members, Mr. James Keller, Environmental Specialist and Mr. Robert Jones, Maintenance Supervisor, at your site on October 7, 2011. Because of your new ownership of this facility, we are pleased to take this opportunity to provide compliance assistance for you and your staff.

We are attaching a copy of the inspection report. Please note the corrections and recommendations needed for compliance with your permit on page three. After reviewing these items, submit a schedule to us by November 14, 2011 indicating which items are complete and let us know the amount of time needed to complete the others.

Should you have any questions or need further assistance, please feel free call me or Michael Young at 407-897-2936. Thank you for your prompt attention to these matters.

Sincerely,

Caroline Shine, Program Administrator
Air Resource Management

Cc: Jameskeller@benada.com

INSPECTION REPORT FORM
AIR POLLUTION EMISSION SOURCES

FACILITY: Benada Aluminum Products, LLC		**DISTRICT:** Central	**COUNTY:** Seminole
ADDRESS: 2540 Jewett Lane, Sanford, Florida 32771		**CONTACT:** James Keller, Environmental Specialist Robert Jones, Maintenance Supervisor	
ARM ID #: 1170027-010	**PERMIT #:** 1170027-010 AF	**Issued Date** 6/30/2011 **Expiration Date** 10/30/14	
SOURCE DESCRIPTION: **Secondary Aluminum Facility with Group I Melt Furnace, Venturi Scrubber and Quenching System**			
INSPECTION DATE: October 6, 2011	**AUDIT TYPE:** Level 2 – Compliance Assistance/Baseline Inspection	**COMPLIANCE STATUS:** **Minor Non Compliance (CWOE)**	

Florida Department of Environmental Protection ("Department") representatives Caroline Shine, Air Program Administrator, Michael Young, Sangeeta Sharma, and John Vigliotti, Engineering Specialists and Allen Rainey, Environmental Specialists met with James Keller, Environmental Specialist (employed since August 2011) and Robert Jones, Senior Maintenance Supervisor of the Benada Aluminum Products, LLC ("Company") at its facility located at 2540 Jewett Lane, Sanford, Florida 32771 ("Facility"). The Department recently transferred the Florida Extruders International's permit to the Company. The Facility has been subject to 40 Part 63, Subpart RRR pertaining to Secondary Aluminum facilities since March 24, 2003.

The compliance assistance with the new owner included review of the permit, records, reports, and physical Level 2 inspection. Mr. Jones informed that the permit was not available to him in the past, but Ms. Shine advised the permit is accessible on the FDEP website. At the time of the visit, the Facility's Group I Melt Furnace, Venturi Scrubber and Quenching System had been shutdown since May 2011, and currently trucks in its aluminum billets (rods). According to Mr. Jones, a bankruptcy court order required many of the Company's records to be confiscated, and those older than seven years were shredded. FDEP representatives reviewed the operation information from May 2008-May 2011, and the January 2011 production information. The company processed 1.2 million pounds of aluminum in past 12 consecutive months. Ms. Shine verified the records that the Company provided during the inspection. She informed Mr. Jones and Mr. Keller that semi-annual reports were not submitted to the Department since 2009, and Company needs to perform the labeling required by 40 Part 63, Subpart RRR . Mr. Jones agreed to take care of the labeling requirements as soon as possible. Weighing Records and PH records were not available during the inspection:

Permitted Maximum:	Observed:
Continuous hours	
25,500 tons of aluminum / consecutive 12 months	6,244.11 12 cons 12 mo/ending May 2011
Natural Gas or Propane	Natural Gas
219,000 MMBTU /consecutive twelve (12) months	30791 MMBTU cons 12 mo/ending May 2011
PH of no less than 7.5- scrubber recirculation water	PH records not available
HAP <10 Tons /consecutive twelve (12) months	HAP- 0.062 tons\VOC Emissions 0.083 tons
HAPS<25 Combined Voc<10	

INSPECTOR(S) NAME(S):
Caroline Shine, Michael Young, John Vigliotti, Allen Rainey, and Sangeeta Sharma

SIGNATURE(S): John Vigliotti, Michael Young, Sangeeta Sharma

DATE: 10/11/2011

PERM FORM NO. 85-1

INSPECTION REPORT FORM
AIR POLLUTION EMISSION SOURCES

FACILITY:		**DISTRICT:**	**COUNTY:**
Benada Aluminum Products, LLC		Central	Seminole
ADDRESS:		**CONTACT:**	
2540 Jewett Lane, Sanford, Florida 32771		James Keller, Environmental Specialist Robert Jones, Maintenance Supervisor	
ARM ID #: 1170027-010	**PERMIT #:** 1170027-010 AF	**Issued Date** 6/30/2011 **Expiration Date** 10/30/14	
SOURCE DESCRIPTION: **Secondary Aluminum Facility with Group I Melt Furnace, Venturi Scrubber and Quenching System**			
INSPECTION DATE: October 6, 2011	**AUDIT TYPE:** Level 2 – Compliance Assistance Inspection	**COMPLIANCE STATUS:** **Minor Non Compliance**	

Mr. Keller escorted the FDEP representatives on site, and explained the various processes and equipment. Because he had been at the company for only 2-3 months, his knowledge was limited on some of the processes. Mr. Jones explained the on-site water process, collection, and recirculation, as well the air source processes. He indicated that the scrubber water recirculation system was being reconstructed, which included 2 new 10,000 gallon water tanks. The Company used about 3-4 (375 gallon) totes of sulfuric acid per 2 months.

Air Process Information: The Company uses truck scales to weigh the incoming scrap aluminum. The scrap is then crushed before being sent to the furnace. We did not observed any cleaning, charging, melting, HD 2000 fluxing, or alloying because this section was not operative. The Company temporarily purchases the rods, rather than melt scrap because it is working on scrubber system improvements and costs. The processed aluminum is shipped in 9-12 feet rods, later cut to smaller ~3 foot sections. (*Normally, the Company would process the scrap aluminum in a staging area, weigh it, and load it into the Melt Furnace. The molten material would then be tested the consistency, and the company would add flux if needed until it met the required specifications, then poured into rod molds. These rods would then be loaded into a homogenizing oven, and cut into ~3 foot sections*). The ~3 foot rods are then loaded into an aluminum extruder. Once the products are formed, the company paints them in the distribution building. They are placed on a continuous conveyor and goes through the following processes and areas: acid spray wash, rinse, dry oven, power coating spray room, curing oven. The distribution building also contains a stripping oven to clean the power coat build up on the conveyor parts.

Pollution Control Device: The Facility uses a venturi wet scrubber to control emissions from the furnace and from the smaller re-drossing furnace (see pictures for the piping connections). The scrubber utilizes a continuous meter to determine the pH value. Both the melting furnace and dross furnace vents to the venturi scrubber.

Facility-wide Conditions:
No pollution control devices appeared to be circumvented or improperly operated.
No areas were observed where precautions had not been taken to minimize pollutant emissions or prevent the release of unconfined particulate.
No objectionable odors were detected on or off the site.
No visible emission were observed coming from the various exhaust stacks. A method-9 observation was not necessary.

INSPECTOR(S) NAME(S):
Caroline Shine, Michael Young, John Vigliotti, Allen Rainey, and Sangeeta Sharma

SIGNATURE(S):	**DATE:**

INSPECTION REPORT FORM
AIR POLLUTION EMISSION SOURCES

FACILITY: Benada Aluminum Products, LLC		**DISTRICT:** Central	**COUNTY:** Seminole
ADDRESS: 2540 Jewett Lane, Sanford, Florida 32771		**CONTACT:** James Keller, Environmental Specialist Robert Jones, Maintenance Supervisor	
ARM ID #: 1170027-010	**PERMIT #:** 1170027-010 AF	**Issued Date** 6/30/2011 **Expiration Date** 10/30/14	
SOURCE DESCRIPTION: **Secondary Aluminum Facility with Group I Melt Furnace, Venturi Scrubber and Quenching System**			
INSPECTION DATE: October 6, 2011	**AUDIT TYPE:** Level 2 – Compliance Assistance Inspection	**COMPLIANCE STATUS:** **Minor Non Compliances (is resolve as CWOE, w/o WL)**	

Additional information/Corrective Action/Recommendations:

1. Operators should be familiar with the requirements of the permit, including 40 Part 63, Subpart RRR
2. In accordance **§ 63.1506 Operating** requirements, Company must perform the labeling requirements outlined in **§ 63.1506 Operating** requirements and monthly monitoring of § 63.1510including: (1) The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decorating kiln, group 1 furnace, group 2 furnace, in-line fluxer). (2)The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g . . ., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan. (3) The afterburner operating temperature and design residence time for a scrap dryer/delacquering kiln/decoating kiln.
3. The crusher would be an Aluminum scrap shredder by definition (unit that crushes, grinds, or breaks aluminum scrap into a more uniform size prior to processing or charging to a scrap dryer/delacquering kiln/decorating kiln, or furnace), must comply with appropriate RRR sections.
4. In accordance with § 63.1506 Operating requirements and of § 63.1510 Monitoring requirements
   - **(a)** Update the OM & M plan to include operation and design of the Capture/collection systems in accordance with
   - (b) Update the OM & M plan to include all parameters
   - (c) Document Feed/charge weight and calibration
   - (d) Comply with the Total reactive flux injection rate requirements
5. In accordance with § 63.1516 Reports
   - (a) Develop a Startup, shutdown, and malfunction plan/reports, if the source cannot located the previous report
   - (b) Submit missing and current submit semiannual reports according to the requirements in §63.10(e)(3).
   - (c) Annual compliance certifications.
6. Located and maintain records in accordance with § 63.1517 Records

(Also see attach table to items the company must correct)

INSPECTOR(S) NAME(S):
Ms. Caroline Shine, Ms. Sangeeta Sharma, Mr. Allen Rainey, Mr. John Vigliotti, and Mr. Michael Young

SIGNATURE(S):	**DATE:**

PERM FORM NO. 85-1

Table 2 to Subpart RRR of Part 63—Summary of Operating Requirements for New and Existing Affected Sources and Emission Units

Affected source/emission unit	Monitor type/operation/process	Operating requirements
All affected sources and emission units with an add-on air pollution control device	Emission capture and collection system	Design and install in accordance with Industrial Ventilation: A Handbook of Recommended Practice; operate in accordance with OM&M plan.[b]
All affected sources and emission units subject to production-based (lb/ton of feed) emission limits[a]	Charge/feed weight or Production weight	Operate a device that records the weight of each charge; Operate in accordance with OM&M plan.[b]
Group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln	Labeling	Identification, operating parameter ranges and operating requirements posted at affected sources and emission units; control device temperature and residence time requirements posted at scrap dryer/delacquering kiln/decoating kiln.
Aluminum scrap shredder with fabric filter	Bag leak detector or	Initiate corrective action within 1-hr of alarm and complete in accordance with OM&M plan[b]; operate such that alarm does not sound more than 5% of operating time in 6-month period.
	COM or	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more and complete in accordance with OM&M plan.[b]
	VE	Initiate corrective action within 1-hr of any observed VE and complete in accordance with the OM&M plan.[b]
Thermal chip dryer with afterburner	Afterburner operating temperature	Maintain average temperature for each 3-hr period at or above average operating temperature during the performance test.
	Afterburner operation	Operate in accordance with OM&M plan.[b]
	Feed material	Operate using only unpainted aluminum chips.
Scrap dryer/delacquering kiln/decoating kiln with afterburner and lime-injected fabric filter	Afterburner operating temperature	Maintain average temperature for each 3-hr period at or above average operating temperature during the performance test.
	Afterburner operation	Operate in accordance with OM&M plan.[b]
	Bag leak detector or	Initiate corrective action within 1-hr of alarm and complete in accordance with the OM&M plan;[b]operate such that alarm does not sound more than 5% of operating time in 6-month period.
	COM	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more and complete in accordance with the OM&M plan.[b]
	Fabric filter inlet temperature	Maintain average fabric filter inlet temperature for each 3-hr period at or below average temperature during the performance test +14 °C (+25 °F).
	Lime injection rate	Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established during the performance test for continuous injection systems.
Sweat furnace with afterburner	Afterburner operating temperature	If a performance test was conducted, maintain average temperature for each 3-hr period at or above average operating temperature during the performance test; if a performance test was not conducted, and afterburner meets specifications of §63.1505(f)(1), maintain average temperature for each 3-hr period at or above 1600 °F.

Affected source/emission unit	Monitor type/operation/process	Operating requirements
	Afterburner operation	Operate in accordance with OM&M plan.[b]
Dross-only furnace with fabric filter	Bag leak detector or	Initiate corrective action within 1-hr of alarm and complete in accordance with the OM&M plan;[b]operate such that alarm does not sound more than 5% of operating time in 6-month period.
	COM	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more and complete in accordance with the OM&M plan.[b]
	Feed/charge material	Operate using only dross as the feed material.
Rotary dross cooler with fabric filter	Bag leak detector or	Initiate corrective action within 1-hr of alarm and complete in accordance with the OM&M plan;[b]operate such that alarm does not sound more than 5% of operating time in 6-month period.
	COM	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more and complete in accordance with the OM&M plan.[b]
In-line fluxer with lime-injected fabric filter (including those that are part of a secondary aluminum processing unit)	Bag leak detector or	Initiate corrective action within 1-hr of alarm and complete in accordance with the OM&M plan;[b]operate such that alarm does not sound more than 5% of operating time in 6-month period.
	COM	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more and complete in accordance with the OM&M plan.[b]
	Lime injection rate	Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established during performance test for continuous injection systems.
	Reactive flux injection rate	Maintain reactive flux injection rate at or below rate used during the performance test for each operating cycle or time period used in the performance test.
In-line fluxer (using no reactive flux material)	Flux materials	Use no reactive flux.
Group 1 furnace with lime-injected fabric filter (including those that are part of a secondary of aluminum processing unit).	Bag leak detector or	Initiate corrective action within 1-hr of alarm; operate such that alarm does not sound more than 5% of operating time in 6-month period; complete corrective action in accordance with the OM&M plan.[b]
	COM	Initiate corrective action within 1-hr of a 6-minute average opacity reading of 5% or more; complete corrective action in accordance with the OM&M plan.[b]
	Fabric filter inlet temperature	Maintain average fabric filter inlet temperature for each 3-hour period at or below average temperature during the performance test +14 °C (+25 °F).
	Reactive flux injection rate	Maintain reactive flux injection rate (kg/Mg) (lb/ton) at or below rate used during the performance test for each furnace cycle.
	Lime injection rate	Maintain free-flowing lime in the feed hopper or silo at all times for continuous injection systems; maintain feeder setting at level established at performance test for continuous injection systems.

Affected source/emission unit	Monitor type/operation/process	Operating requirements
	Maintain molten aluminum level	Operate sidewell furnaces such that the level of molten metal is above the top of the passage between sidewell and hearth during reactive flux injection, unless the hearth is also controlled.
	Fluxing in sidewell furnace hearth	Add reactive flux only to the sidewell of the furnace unless the hearth is also controlled.
Group 1 furnace without add-on controls (including those that are part of a secondary aluminum processing unit)	Reactive flux injection rate	Maintain reactive flux injection rate (kg/Mg) (lb/ton) at or below rate used during the performance test for each operating cycle or time period used in the performance test.
	Site-specific monitoring plan[c]	Operate furnace within the range of charge materials, contaminant levels, and parameter values established in the site-specific monitoring plan.
	Feed material (melting/holding furnace)	Use only clean charge.
Clean (group 2) furnace	Charge and flux materials	Use only clean charge. Use no reactive flux.

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

[b]OM&M plan—Operation, maintenance, and monitoring plan.

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

[65 FR 15710, Mar. 23, 2000, as amended at 67 FR 79818, Dec. 30, 2002; 69 FR 53984, Sept. 3, 2004]

Table 3 to Subpart RRR of Part 63—Summary of Monitoring Requirements for New and Existing Affected Sources and Emission Units

Affected source/Emission unit	Monitor type/Operation/Process	Monitoring requirements
All affected sources and emission units with an add-on air pollution control device	Emission capture and collection system	Annual inspection of all emission capture, collection, and transport systems to ensure that systems continue to operate in accordance with ACGIH standards.
All affected sources and emission units subject to production-based (lb/ton of feed/charge) emission limits[a]	Feed/charge weight	Record weight of each feed/charge, weight measurement device or other procedure accuracy of ±1%[b]; calibrate according to manufacturers specifications, or at least once every 6 months.
Group 1 furnace, group 2 furnace, in-line fluxer, and scrap dryer/delacquering kiln/decoating kiln	Labeling	Check monthly to confirm that labels are intact and legible.
Aluminum scrap shredder with fabric filter	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance"[c]; record voltage output from bag leak detector.
	COM or	Design and install in accordance with PS–1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages.
	VE	Conduct and record results of 30-minute daily test in accordance with Method 9.

Affected source/Emission unit	Monitor type/Operation/Process	Monitoring requirements
All affected sources and emission units with an add-on air pollution control device	Emission capture and collection system	Annual inspection of all emission capture, collection, and transport systems to ensure that systems continue to operate in accordance with ACGIH standards.
All affected sources and emission units subject to production-based (lb/ton of feed/charge) emission limits[a]	Feed/charge weight	Record weight of each feed/charge, weight measurement device or other procedure accuracy of ±1%[b]; calibrate according to manufacturers specifications, or at least once every 6 months.
Group 1 furnace, group 2 furnace, in-line fluxer, and scrap dryer/delacquering kiln/decoating kiln	Labeling	Check monthly to confirm that labels are intact and legible.
Thermal chip dryer with afterburner	Afterburner operating temperature	Continuous measurement device to meet specifications in §63.1510(g)(1); record average temperature for each 15-minute block; determine and record 3-hr block averages.
	Afterburner operation	Annual inspection of afterburner internal parts; complete repairs in accordance with the OM&M plan.
	Feed/charge material	Record identity of each feed/charge; certify feed/charge materials every 6 months.
Scrap dryer/delacquering kiln/decoating kiln with afterburner and lime-injected fabric filter	Afterburner operating temperature.	Continuous measurement device to meet specifications in §63.1510(g)(1); record temperature for each 15-minute block; determine and record 3-hr block averages.
	Afterburner operation	Annual inspection of afterburner internal parts; complete repairs in accordance with the OM&M plan.
	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance[c]; record voltage output from bag leak detector.
	COM	Design and Install in accordance with PS–1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages.
	Lime injection rate	For continuous injection systems, inspect each feed hopper or silo every 8 hours to verify that lime is free flowing; record results of each inspection. If blockage occurs, inspect every 4 hours for 3 days; return to 8-hour inspections if corrective action results in no further blockage during 3-day period, record feeder setting daily.
	Fabric filter inlet temperature.	Continuous measurement device to meet specifications in §63.1510(h)(2); record temperatures in 15-minute block averages; determine and record 3-hr block averages.
Sweat furnace with afterburner	Afterburner operating temperature	Continuous measurement device to meet specifications in §63.1510(g)(1); record temperatures in 15-minute block averages; determine and record 3-hr block averages.
	Afterburner operation	Annual inspection of afterburner internal parts; complete repairs in accordance with the OM&M plan.
Dross-only furnace with fabric filter	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance"[c]; record output voltage from bag leak detector.
	COM	Design and install in accordance with PS–1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages.

Affected source/Emission unit	Monitor type/Operation/Process	Monitoring requirements
All affected sources and emission units with an add-on air pollution control device	Emission capture and collection system	Annual inspection of all emission capture, collection, and transport systems to ensure that systems continue to operate in accordance with ACGIH standards.
All affected sources and emission units subject to production-based (lb/ton of feed/charge) emission limits[a]	Feed/charge weight	Record weight of each feed/charge, weight measurement device or other procedure accuracy of ±1%[b]; calibrate according to manufacturers specifications, or at least once every 6 months.
Group 1 furnace, group 2 furnace, in-line fluxer, and scrap dryer/delacquering kiln/decoating kiln	Labeling	Check monthly to confirm that labels are intact and legible.
	Feed/charge material	Record identity of each feed/charge; certify charge materials every 6 months.
Rotary dross cooler with fabric filter	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance"[c]; record output voltage from bag leak detector.
	COM	Design and install in accordance with PS–1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages.
In-line fluxer with lime-injected fabric filter	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance"[c]; record output voltage from bag leak detector.
	COM	Design and install in accordance with PS–1; collect data in accordance with subpart A of 40 CFR part 63; determine and record 6-minute block averages
	Reactive flux injection rate	Weight measurement device accuracy of ±1%[b]; calibrate according to manufacturer's specifications or at least once every 6 months; record time, weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test; or Alternative flux injection rate determination procedure per §63.1510(j)(5).
	Lime injection rate	For continuous injection systems, record feeder setting daily and inspect each feed hopper or silo every 8 hrs to verify that lime is free-flowing; record results of each inspection. If blockage occurs, inspect every 4 hrs for 3 days; return to 8-hour inspections if corrective action results in no further blockage during 3-day period.[d]
In-line fluxer using no reactive flux	Flux materials	Record flux materials; certify every 6 months for no reactive flux.
Group 1 furnace with lime-injected fabric filter	Bag leak detector or	Install and operate in accordance with "Fabric Filter Bag Leak Detection Guidance"[c]; record output voltage from bag leak detector.
	COM	Design and install in accordance with PS–1; collect data in accordance with subpart A of 40 part CFR 63; determine and record 6-minute block averages.
	Lime injection rate	For continuous injection systems, record feeder setting daily and inspect each feed hopper or silo every 8 hours to verify that lime is free-flowing; record results of each inspection. If blockage occurs, inspect every 4 hours for 3 days; return to 8-hour

Affected source/Emission unit	Monitor type/Operation/Process	Monitoring requirements
All affected sources and emission units with an add-on air pollution control device	Emission capture and collection system	Annual inspection of all emission capture, collection, and transport systems to ensure that systems continue to operate in accordance with ACGIH standards.
All affected sources and emission units subject to production-based (lb/ton of feed/charge) emission limits[a]	Feed/charge weight	Record weight of each feed/charge, weight measurement device or other procedure accuracy of ±1%[b]; calibrate according to manufacturers specifications, or at least once every 6 months.
Group 1 furnace, group 2 furnace, in-line fluxer, and scrap dryer/delacquering kiln/decoating kiln	Labeling	Check monthly to confirm that labels are intact and legible.
		inspections if corrective action results in no further blockage during 3-day period.[d]
	Reactive flux injection rate	Weight measurement device accuracy of ±1%[b]; calibrate every 3 months; record weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test; or Alternative flux injection rate determination procedure per §63.1510(j)(5).
	Fabric filter inlet temperature	Continuous measurement device to meet specifications in §63.1510(h)(2); record temperatures in 15-minute block averages; determine and record 3-hour block averages.
	Maintain molten aluminum level in sidewell furnace	Maintain aluminum level operating log; certify every 6 months.
Group 1 furnace without add-on controls	Fluxing in sidewell furnace hearth	Maintain flux addition operating log; certify every 6 months.
	Reactive flux injection rate	Weight measurement device accuracy of +1%[b]; calibrate according to manufacturers specifications or at least once every six months; record weight and type of reactive flux added or injected for each 15-minute block period while reactive fluxing occurs; calculate and record total reactive flux injection rate for each operating cycle or time period used in performance test.
	OM&M plan (approved by permitting agency)	Demonstration of site-specific monitoring procedures to provide data and show correlation of emissions across the range of charge and flux materials and furnace operating parameters.
	Feed material (melting/holding furnace)	Record type of permissible feed/charge material; certify charge materials every 6 months.
Clean (group 2) furnace	Charge and flux materials	Record charge and flux materials; certify every 6 months for clean charge and no reactive flux.

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

http://www.epa.gov/ttn/atw/alum2nd/malfunctionplanver-6.pdf

FLORIDA EXTRUDERS INTERNATIONAL, INC.
PRODUCTION / HEAT INPUT / VOC / HAPS Emissions / Log
12 Month Running Totals

Month	Aluminum Melted (TONS)	Aluminum Melted 12-Month Running Total (TONS)	Natural Gas Used (MMCU.FT.)	Heat Input (MMBTU)	Heat Input 12-Month Running Total (MMBTU)	VOC Emissions (Tons)	VOC Emissions 12-Month Running Total (Tons)	HAP Emissions (Tons)	HAP Emissions 12-Month Running Total (Tons)
automatically. Values beyond the last entry are not valid.									
May-09	661.67	7709.91	3.67	3761.75	37586.8	0.01	0.101	0.007	0.077
Jun-09	765.36	8475.27	3.88	3977.00	41563.8	0.01	0.112	0.008	0.085
Jul-09	568.22	7970.34	2.98	3054.50	41215.3	0.01	0.111	0.006	0.080
Aug-09	1012.54	7404.04	4.55	4663.75	39636.8	0.01	0.106	0.010	0.074
Sep-09	1037.63	8159.74	5.93	6078.25	42814.3	0.02	0.115	0.010	0.082
Oct-09	1254.16	8677.04	5.78	5924.50	44690.0	0.02	0.120	0.013	0.087
Nov-09	981.97	9659.01	5.68	5822.00	50030.3	0.02	0.134	0.010	0.097
Dec-09	44.98	9356.74	1.02	1045.50	49835.5	0.00	0.134	0.000	0.094
Jan-10	765.17	9069.32	3.06	3136.50	47795.8	0.01	0.128	0.008	0.091
Feb-10	537.11	8861.08	2.48	2542.00	46699.0	0.01	0.125	0.005	0.089
Mar-10	457.30	8538.74	2.44	2501.00	45284.5	0.01	0.121	0.005	0.085
Apr-10	623.39	8709.50	2.89	2962.25	45469.0	0.01	0.122	0.006	0.087
May-10	591.09	8638.92	3.14	3218.50	44925.8	0.01	0.121	0.006	0.086
Jun-10	803.73	8677.29	4.12	4223.00	45171.8	0.01	0.121	0.008	0.087
Jul-10	796.10	8905.17	4.01	4110.25	46227.5	0.01	0.124	0.008	0.089
Aug-10	673.45	8566.08	3.74	3833.50	45397.3	0.01	0.122	0.007	0.086
Sep-10	632.19	8160.64	3.44	3526.00	42845.0	0.01	0.115	0.006	0.082
Oct-10	753.22	7659.70	3.85	3946.25	40866.8	0.01	0.110	0.008	0.077
Nov-10	517.47	7195.20	2.66	2726.50	37771.3	0.01	0.101	0.005	0.072
Dec-10	491.06	7641.28	2.56	2624.00	39349.8	0.01	0.106	0.005	0.076
Jan-11	600.54	7476.65	2.95	3023.75	39237.0	0.01	0.105	0.006	0.075
Feb-11	132.60	7072.14	1.08	1107.00	37802.0	0.00	0.101	0.001	0.071
Mar-11	350.08	6964.92	1.63	1670.75	36971.8	0.00	0.099	0.004	0.070
Apr-11	258.06	6599.59		0.00	34009.5	0.00	0.091	0.003	0.066
May-11	235.61	6244.11		0.00	30791.0	0.00	0.083	0.002	0.062

FLORIDA EXTRUDERS INTERNATIONAL, INC.
PRODUCTION / HEAT INPUT / VOC / HAPS Emissions / Log
12 Month Running Totals

Month	Aluminum Melted (TONS)	Aluminum Melted 12-Month Running Total (TONS)	Natural Gas Used (MMCU.FT.)	Heat Input (MMBTU)	Heat Input 12-Month Running Total (MMBTU)	VOC Emissions (Tons)	VOC Emissions 12-Month Running Total (Tons)	HAP Emissions (Tons)	HAP Emissions 12-Month Running Total (Tons)
automatically. Values beyond the last entry are not valid.									
Jun-08	0.00	7140.87	0.00	0.00	32574.5	0.00	0.087	0.000	0.071
Jul-08	1073.15	6809.08	3.32	3403.00	29745.5	0.01	0.080	0.011	0.068
Aug-08	1578.84	7026.44	6.09	6242.25	29971.0	0.02	0.080	0.016	0.070
Sep-08	281.93	6190.95	2.83	2900.75	27787.8	0.01	0.075	0.003	0.062
Oct-08	736.86	6015.59	3.95	4048.75	27244.5	0.01	0.073	0.007	0.060
Nov-08	0.00	5357.42	0.47	481.75	24005.5	0.00	0.064	0.000	0.054
Dec-08	347.25	4317.48	1.21	1240.25	19874.8	0.00	0.053	0.003	0.043
Jan-09	1052.59	5070.62	5.05	5176.25	23493.0	0.01	0.063	0.011	0.051
Feb-09	745.35	5815.97	3.55	3638.75	27131.8	0.01	0.073	0.007	0.058
Mar-09	779.64	6595.61	3.82	3915.50	31047.3	0.01	0.083	0.008	0.066
Apr-09	452.63	7048.24	2.71	2777.75	33825.0	0.01	0.091	0.005	0.070

FLORIDA EXTRUDERS INTERNATIONAL, INC.
PRODUCTION / HEAT INPUT / VOC / HAPS Emissions / Log
12 Month Running Totals

Month	Aluminum Melted (TONS)	Aluminum Melted 12-Month Running Total (TONS)	Natural Gas Used (MMCU.FT.)	Heat Input (MMBTU)	Heat Input 12-Month Running Total (MMBTU)	VOC Emissions (Tons)	VOC Emissions 12-Month Running Total (Tons)	HAP Emissions (Tons)	HAP Emissions 12-Month Running Total (Tons)
automatically. Values beyond the last entry are not valid.									
Apr-05	1732.07	17437.97	10.31	10567.75	105575.0	0.03	0.283	0.017	0.174
May-05	1424.09	17097.02	10.46	10721.50	105370.0	0.03	0.283	0.014	0.171
Jun-05	867.90	16553.02	5.61	5750.25	101721.0	0.02	0.273	0.009	0.166
Jul-05	1003.78	16267.39	6.22	6375.50	99568.5	0.02	0.267	0.010	0.163
Aug-05	1513.89	16171.94	9.46	9696.50	99589.0	0.03	0.267	0.015	0.162
Sep-05	1675.19	16738.71	10.35	10608.75	103853.0	0.03	0.279	0.017	0.167
Oct-05	1788.97	17417.29	10.43	10690.75	107881.3	0.03	0.289	0.018	0.174
Nov-05	1635.21	17424.23	10.26	10516.50	109080.5	0.03	0.293	0.016	0.174
Dec-05	1506.77	17968.88	9.96	10209.00	113354.8	0.03	0.304	0.015	0.180
Jan-06	1786.68	18052.76	10.42	10680.50	114246.5	0.03	0.307	0.018	0.181
Feb-06	1618.86	18198.90	8.43	8640.75	114123.5	0.02	0.306	0.016	0.182
Mar-06	1842.15	18395.56	9.92	10168.00	114625.8	0.03	0.308	0.018	0.184
Apr-06	1543.98	18207.47	10.69	10957.25	115015.3	0.03	0.309	0.015	0.182

FLORIDA EXTRUDERS INTERNATIONAL, INC.
PRODUCTION / HEAT INPUT / VOC / HAPS Emissions / Log
12 Month Running Totals

Month	Aluminum Melted (TONS)	Aluminum Melted 12-Month Running Total (TONS)	Natural Gas Used (MMCU.FT.)	Heat Input (MMBTU)	Heat Input 12-Month Running Total (MMBTU)	VOC Emissions (Tons)	VOC Emissions 12-Month Running Total (Tons)	HAP Emissions (Tons)	HAP Emissions 12-Month Running Total (Tons)
automatically. Values beyond the last entry are not valid.									
May-06	0.00	16783.38	0.09	92.25	104386.0	0.00	0.280	0.000	0.168
Jun-06	860.24	16775.72	4.51	4622.75	103258.5	0.01	0.277	0.009	0.168
Jul-06	1794.21	17566.15	9.69	9932.25	106815.3	0.03	0.287	0.018	0.176
Aug-06	1519.99	17572.25	8.36	8569.00	105687.8	0.02	0.284	0.015	0.176
Sep-06	612.54	16509.60	3.34	3423.50	98502.5	0.01	0.264	0.006	0.165
Oct-06	497.92	15218.55	3.94	4038.50	91850.3	0.01	0.246	0.005	0.152
Nov-06	21.01	13604.35	0.18	184.50	81518.3	0.00	0.219	0.000	0.136
Dec-06	0.00	12097.58	0.00	0.00	71309.3	0.00	0.191	0.000	0.121
Jan-07	0.00	10310.90	0.00	0.00	60628.8	0.00	0.163	0.000	0.103
Feb-07	0.00	8692.04	0.06	61.50	52049.5	0.00	0.140	0.000	0.087
Mar-07	1249.87	8099.76	4.49	4602.25	46483.8	0.01	0.125	0.012	0.081
Apr-07	1768.39	8324.17	6.35	6508.75	42035.3	0.02	0.113	0.018	0.083
May-07	1067.16	9391.33	4.50	4612.50	46555.5	0.01	0.125	0.011	0.094
Jun-07	1219.55	9750.64	5.05	5176.25	47109.0	0.01	0.126	0.012	0.098
Jul-07	1404.94	9361.37	6.08	6232.00	43408.8	0.02	0.116	0.014	0.094
Aug-07	1361.48	9202.86	5.87	6016.75	40856.5	0.02	0.110	0.014	0.092
Sep-07	1117.42	9707.74	4.96	5084.00	42517.0	0.01	0.114	0.011	0.097
Oct-07	912.22	10122.04	4.48	4592.00	43070.5	0.01	0.116	0.009	0.101
Nov-07	658.17	10759.20	3.63	3720.75	46606.8	0.01	0.125	0.007	0.108
Dec-07	1387.19	12146.39	5.24	5371.00	51977.8	0.01	0.139	0.014	0.121
Jan-08	299.45	12445.84	1.52	1558.00	53535.8	0.00	0.144	0.003	0.124
Feb-08	0.00	12445.84	0.00	0.00	53474.3	0.00	0.143	0.000	0.124
Mar-08	0.00	11195.97	0.00	0.00	48872.0	0.00	0.131	0.000	0.112
Apr-08	0.00	9427.58	0.00	0.00	42363.3	0.00	0.114	0.000	0.094
May-08	0.00	8360.42	0.00	0.00	37750.8	0.00	0.101	0.000	0.084

FLORIDA EXTRUDERS INTERNATIONAL, INC.
PRODUCTION / HEAT INPUT / VOC / HAPS Emissions / Log
12 Month Running Totals

	ENTRY NEEDED		ENTRY NEEDED						
Month	Aluminum Melted (TONS)	Aluminum Melted 12-Month Running Total (TONS)	Natural Gas Used (MMCU.FT.)	Heat Input (MMBTU)	Heat Input 12-Month Running Total (MMBTU)	VOC Emissions (Tons)	VOC Emissions 12-Month Running Total (Tons)	HAP Emissions (Tons)	HAP Emissions 12-Month Running Total (Tons)
automatically. Values beyond the last entry are not valid.									
May-03	1953.49	1953.49	8.58	8799.01	N/A	0.02	N/A	0.020	N/A
Jun-03	1762.70	3716.19	8.11	8315.92	N/A	0.02	N/A	0.018	N/A
Jul-03	1783.14	5499.33	8.23	8440.72	N/A	0.02	N/A	0.018	N/A
Aug-03	1567.93	7067.26	7.25	7435.53	N/A	0.02	N/A	0.016	N/A
Sep-03	1772.41	8839.67	5.71	5852.75	N/A	0.02	N/A	0.018	N/A
Oct-03	1753.04	10592.71	9.90	10147.50	N/A	0.03	N/A	0.018	N/A
Nov-03	1630.68	12223.39	11.15	11428.75	N/A	0.03	N/A	0.016	N/A
Dec-03	595.43	12818.83	2.28	2337.00	N/A	0.01	N/A	0.006	N/A
Jan-04	1252.35	14071.18	7.86	8056.50	N/A	0.02	N/A	0.013	N/A
Feb-04	1318.54	15389.72	8.17	8374.25	N/A	0.02	N/A	0.013	N/A
Mar-04	1433.43	16823.15	9.98	10229.50	N/A	0.03	N/A	0.014	N/A
Apr-04	1300.16	18123.31	8.05	8251.25	97668.7	0.02	0.262	0.013	0.181
May-04	1765.04	17934.87	10.66	10926.50	99796.2	0.03	0.268	0.018	0.179
Jun-04	1411.90	17584.06	9.17	9399.25	100879.5	0.03	0.271	0.014	0.176
Jul-04	1289.41	17090.33	8.32	8528.00	100966.8	0.02	0.271	0.013	0.171
Aug-04	1609.34	17131.74	9.44	9676.00	103207.3	0.03	0.277	0.016	0.171
Sep-04	1108.42	16467.75	6.19	6344.75	103699.3	0.02	0.278	0.011	0.165
Oct-04	1110.39	15825.10	6.50	6662.50	100214.3	0.02	0.269	0.011	0.158
Nov-04	1628.27	15822.69	9.09	9317.25	98102.8	0.02	0.263	0.016	0.158
Dec-04	962.12	16189.38	5.79	5934.75	101700.5	0.02	0.273	0.010	0.162
Jan-05	1702.80	16639.82	9.55	9788.75	103432.8	0.03	0.278	0.017	0.166
Feb-05	1472.72	16794.00	8.55	8763.75	103822.3	0.02	0.279	0.015	0.168
Mar-05	1645.49	17006.06	9.43	9665.75	103258.5	0.03	0.277	0.016	0.170

					SCRAP	SCRAP	LNTH SCRAP	SCRAP			SOWS	CHIPS	SAW BUTTS	PRESS RECLAIM	BAD BILLET	M CAST TABLE RECLAI M	CU	SI	MAG	CR	MN	TOTAL			PRESS RECLAIM	CAST TABLE RECLAI M	
8-Jan-10	1		2180	58083	13200				73463								0	0	59	0	0	73522	8-Jan-10	1	0	0	
9-Jan-10	2		7380	15800					23180	7920	8720		940	1220			0	0	50	0	0	42030	9-Jan-10	2	0	0	
9-Jan-10	3			9190	7080		3,541		19811	11300	8760				2860		0	17	78	0	0	42826	10-Jan-10	3	2860	0	
10-Jan-10	4			12460	2500		2,000		16960	13500	8800						0	18	66	0	0	39344	10-Jan-10	4	0	0	
11-Jan-10	5			10080	3920		2,000		16000	12900	8640				3660		0	7	70	0	0	41277	11-Jan-10	5	3660	0	
11-Jan-10	6		10780	7100					17880	14600	8780		1315				0	14	66	0	0	42655	11-Jan-10	6	0	0	
11-Jan-10	7		6361	7255	3500		200		17316	18040	5100			870	1840		0	0	70	0	0	43236	12-Jan-10	7	1840	0	
12-Jan-10	8		2720	11400	5389				19509	18480	5200						0	200	63	0	0	43452	12-Jan-10	8	0	0	
12-Jan-10	9		7200	6844					14044	15420	2720			5360	1580		0	60	40	0	0	39224	12-Jan-10	9	1580	0	
12-Jan-10	10		4745	9768	408				14921	15100	5300		560	5040			0	98	59	0	0	41078	13-Jan-10	10	0	0	
13-Jan-10	11		3740	5625					9365	15380	5180			5460	2660		0	81	60	0	0	38186	13-Jan-10	11	2660	0	
13-Jan-10	12		2069	1187	917				4173	17120	4380		5620	5260	2600		0	94	52	0	0	39299	13-Jan-10	12	2600	0	
13-Jan-10	13		1200	10385	1480				13065	13160	8520		900	5254	1720		0	105	79	0	0	42803	14-Jan-10	13	1720	0	
14-Jan-10	14		3006	6367	1355		560		11288	14740	9340			5360	1480		0	0	107	0	0	42315	14-Jan-10	14	1480	0	
14-Jan-10	15			8362					8362	13560	7120			6960	1480		0	0	75	0	0	37557	14-Jan-10	15	1480	0	
15-Jan-10	16			6892					6892	14040	11200		800				0	0	98	0	0	33030	15-Jan-10	16	0	0	
15-Jan-10	17		2200	7538	1384				11122	15520	12340		790	1700	1640		0	14	98	0	0	43224	16-Jan-10	17	1640	0	
16-Jan-10	18			6680	1000		4,400		12080	16800	12300		740	5450			0	6	95	0	0	47471	16-Jan-10	18	0	0	
16-Jan-10	19		860	1479					2339	13740	14840		460	4000	4600		0	36	98	0	0	40113	17-Jan-10	19	4600	0	
18-Jan-10	20				1020		700		1720	27660	18100			4600			133	187	312	28	21	52761	18-Jan-10	20	0	0	
18-Jan-10	21		1871	3499	680				6050	18060	11960				5040		21	65	156	6	6	41364	18-Jan-10	21	5040	0	
18-Jan-10	22			6647					6647	19540	10700			4990	2480		106	141	222	29	15	44870	19-Jan-10	22	2480	0	
19-Jan-10	23			894	900				1794	21930	9780		1180		5680		85	98	205	14	14	40780	19-Jan-10	23	5680	0	
19-Jan-10	24		2847	3557	949				7353	16780	6040		460	3900	5780		78	70	130	20	14	40625	20-Jan-10	24	5780	0	
20-Jan-10	25		1118	4489	577				6184	18500	7780		340		7330		67	58	204	14	8	40485	20-Jan-10	25	7330	0	
20-Jan-10	26			6153	743		11,620		18516	9800	9400		480	2980			0	0	0	0	0	41176	21-Jan-10	26	0	0	
21-Jan-10	27			6753					6753	23140	10580				1340		0	28	60	0	0	41901	21-Jan-10	27	1340	0	
21-Jan-10	28		3298	2817	427		1,470		8012	21280	11120			1190			0	21	82	0	0	41705	21-Jan-10	28	0	0	
21-Jan-10	29		2232	9536	1744				13512	11900	19780						0	80	147	0	0	45419	21-Jan-10	29	0	0	
25-Jan-10	30		890	9958	657				11505	10480	15460		500		3300		0	63	72	0	0	41380	25-Jan-10	30	3300	0	
25-Jan-10	31		2827	3394	472				6693	13800	12120			3270	1710		0	45	90	0	0	37728	26-Jan-10	31	1710	0	
26-Jan-10	32			1464	1460				2924	22960	14800						0	76	79	0	0	40839	26-Jan-10	32	0	0	
26-Jan-10	33			3667	735		1,320		5722	14970	10860		1900	6230	1960		0	18	56	0	0	41716	26-Jan-10	33	1960	0	
26-Jan-10	34			1280			33,560		34840							2240	0	50	16	8	0	37154	27-Jan-10	34	0	0	
27-Jan-10	35		4520	6276	1000		2,750		14546	15360	2940				2340	1260	0	0	9	0	0	36455	27-Jan-10	35	2340	0	
28-Jan-10	36		2131	10795	1424				14350	14520	14720		800	6833			0	22	87	0	0	51332	28-Jan-10	36	0	0	
TOTAL		-	**76,175**	**283,674**	**54,921**	-	**64,121**	-	**478,891**	**542,000**	**333,380**	-	**17,785**	**85,927**	**63,080**	**3,500**	-	**490**	**1,772**	**3,310**	**119**	**78**	**1,530,332**			**63,080**	-	

END OF JAN. 2010 PRODUCTION

1170027 Benada Aluminum Products LLC
Pictures taken on October 6, 2011 by Michael Young

Shows the current piping configuration

Outlet port for Stack testing

Inlet port from stack tesing.

This pipe is for the draw-press that is connected to the Venturi Scrubber

Shows the current Venturi Scrubber.

Shows the continuous loggers for the pH and the water flow.

1170027 Benada Aluminum Products LLC
Pictures taken on October 6, 2011 by Michael Young

Shows the current piping configuration

Outlet port for Stack testing

Inlet port from stack tesing.

This pipe is for the draw-press that is connected to the Venturi Scrubber

Shows the current Venturi Scrubber.

Shows the continuous loggers for the pH and the water flow.