Florida Department of Environmental Protection

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Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

Hydro Aluminum North America, Inc.
200 Riviera Boulevard
St. Augustine, Florida 32086

Air Permit Number: 1090447-009-AC
Date of Issue: October 15, 2010
Expiration Date: October 15, 2011

Authorized Representative:
Mr. Allan Annis, Director of Operations

St. Augustine Facility
Permit Modification

This is the final air construction permit, which authorizes:

(1) The revision of the permitted capacity of the Remelt Furnace (EU 004) and the Holding Furnace (EU 003),
(2) The Holding Furnace (EU 003) to only process clean charge as defined by 40 CFR 63 Subpart RRR,
(3) The removal of Xylene and Methyl Ethyl Ketone (MEK) emissions limits, the paint usage limitation, and the hours of operation limitations for the bake oven and pyrolysis furnace of EU 001.
(4) The reclassification of No. 1 & No. 2 Homogenizing Furnaces (EU 005) to "unregulated unit", and OPC age oven & work shop (EU 007 & 008) as "insignificant activities" in the Title V Air Operation Permit.
(5) The replacement the current sill block on the Remelt Furnace to increase the free-board. This will aid in keeping aluminum from spilling out of the furnace. Also the replacement of the swivel/rotary joint on the discharge side of the Remelt Furnace, which is primarily for safety reasons but will also improve the drain time of the aluminum, which potentially will increase the feed/charge rate on an hourly and annual basis.
(6) The removal of the PM and HCl emissions limits for the Remelt Furnace (EU 004) and the Holding Furnace (EU 003).
(7) The temporary allowance for the Remelt Furnace to operate without the wet scrubber during a Dioxins/Furans and visible emissions test. This will allow the facility an opportunity to demonstrate that the Dioxin/Furan 40 CFR 63 Subpart RRR standard can be met without the need of the wet scrubber.
(8) For the modification the performance restrictions of the surface coating operation (EU001), OPC solvent tank (EU 006) and the 140/142 Solvent Tank now known as the General Drawn Tubing (GDT) solvent tank (EU 009).
(9) The reduction in the maximum allowed percentage of aluminum that contains paint, lubricants, or other foreign materials from 50 to 35% by weight of the total charge mixture to be processed in the Remelt Furnace (Emissions Unit 004).
(10) The addition of permit condition language for the Remelt Furnace (Emissions Unit 004) which clarifies the period during which the wet scrubber is in operation during the charging of aluminum that contains paint, lubricants, or other foreign materials.

The proposed modification will be conducted at the Hydro Aluminum North America, Inc. St. Augustine facility, which is a Secondary Aluminum Production Facility (Standard Industrial Classification No. 3354 & 3341). The facility is located in St. Johns County at 200 Riviera Boulevard, St. Augustine, Florida. The UTM coordinates are Zone 17, 470.98 km East; 3296.85 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

10-15-10

Christopher L. Kirts, P. E.
District Air Program Administrator

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 10/15/10 to the persons listed below.

Mr. Allan Annis, Hydro Aluminum North America, Inc.: Allan.annis@hydro.com
Mr. Timothy Keesling, Hydro Aluminum North America, Inc.: Timothy.keesling@hydro.com
Mr. Kennard F. Kosky, Golder Associates, Inc.: kkosky@golder.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Marjorie M Riley 10-15-10

(Clerk) (Date)

FACILITY DESCRIPTION

Hydro Aluminum North America (Hydro), Inc. is a secondary aluminum production facility. The facility consists of an aluminum melting furnace, a holding furnace, two homogenizing furnaces, aluminum extrusion operations, wet and powder paint operations, solvent tanks and ancillary operations.

PROPOSED PROJECT

- Hydro is proposing a production increase for the Remelt Furnace (EU 004) and the Holding Furnace (EU 003). The feed/charge of the Remelt Furnace and the Holding Furnace will increase from 25 tons/operating cycle to 30 tons/operating cycle each. The Holding Furnace will be permitted to only hold or process clean charge as defined by 40 CFR 63.1505 (molten aluminum received from the Remelt Furnace and alloying elements), and operate as *Group 2 furnace* as defined in 40 CFR 63, Subpart RRR. The maximum annual feed/charge of the Remelt Furnace and the Holding Furnace will increase from 62,500 tons/12 consecutive months to 80,000 tons/ 12 consecutive months. In accordance with Rule 62-212.400(2)(a)1., F.A.C., the application included a *Baseline Actual-to-Projected Actual Applicability* Test that was used to determine whether the proposed project cause a major modification at an existing major stationary source, thus triggering PSD review.
- Hydro is requesting to replace the current sill block on the Remelt Furnace to increase the free-board. This will aid in keeping aluminum from spilling out of the furnace. Hydro is also requesting to replace the swivel/rotary joint on the discharge side of the Remelt Furnace. This replacement is primarily for safety reasons but shall also improve the drain time of the aluminum, which potentially will increase the feed/charge rate on hourly & yearly basis.
- Hydro is requesting to operate the Remelt Furnace (EU 004) without operation of the wet scrubber whenever the Remelt Furnace is processing clean charge only.
- Hydro is requesting the temporary allowance to operate the Remelt Furnace (EU 004) without the wet scrubber in operation during a Dioxin/Furans and a visible emissions performance test. The Dioxin/Furan test will allow the facility an opportunity to demonstrate that the Dioxin/Furan 40 CFR 63 Subpart RRR standard can be met without the need of the wet scrubber. The performance test will be conducted while the Remelt Furnace processes aluminum that contains paint, lubricants, coatings, or other foreign materials.
- Hydro is requesting to remove the PM and HCl emissions limits for the Remelt Furnace (EU 004) and the Holding Furnace (EU 003). Hydro is requesting to modify the performance restrictions of the surface coating operation (EU 001), OPC solvent tank (EU 006) and the 140/142 Solvent Tank now known as the General Drawn Tubing (GDT)solvent tank (EU 009).
- Hydro is requesting the reclassification of No. 1 & No. 2 Homogenizing Furnaces (EU 005) to "unregulated unit", and OPC age oven & work shop (EU 007 & 008) as "insignificant activities" in the Title V Air Operation Permit in accordance with Rule 62-213.430(6)(b) and Rule 62-210.300(3) , F.A.C.
- Hydro is requesting the reduction in the maximum allowed percentage of aluminum that contains paint, lubricants, or other foreign materials from 50 to 35% by weight of the total charge mixture to be processed in the Remelt Furnace (Emissions Unit 004).
- Hydro is requesting the addition of permit condition language for the Remelt Furnace (Emissions Unit 004) which clarifies the period during which the wet scrubber is in operation during the charging of aluminum that contains paint, lubricants, or other foreign materials.

This project will modify the following emissions units.

Facility ID No. 1090447	
ID No.	**Emission Unit Description**
001	Surface Coating Operations
003	Holding Furnace
004	Melting Furnace
005	No. 1 & No.2 Homogenizing Furnace
006	OPC Solvent Tank
007	OPC Age Oven
008	OPC Workshop
009	GDT Solvent Tank

Under this project, the In-line Fluxer which in previously issued permits has been included with the Holding Furnace (Emissions Unit 003), will be identified as a separate emissions unit consistent with the 40 CFR 63 Subpart RRR definition of a Secondary Aluminum Processing Unit, 40 CFR 63.1503.

Facility ID No. 1090447	
ID No.	**Emission Unit Description**
010	In-line Fluxer

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

Applicable Unit Specific Rules

The Remelt Furnace (EU 004) and the Holding Furnace (EU 003) are subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256. The Permitting Authority's telephone number is 904/807-3300.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Existing Permits and Regulations: This permit supplements all previous permits issued for the above named emissions units. These conditions supersede corresponding similar conditions specified in previous air construction permits. However, if not specifically regulated by this permit, the standards and permit requirements from previous air construction permits remain valid. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

   [Rule 62-4.070, F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

   [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

   [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

9. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

   a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

   b. The permittee shall report to the Department within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

      1) The name, address and telephone number of the owner or operator of the major stationary source;

      2) The annual emissions as calculated pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

      3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

      4) Any other information that the owner or operator wishes to include in the report.

   c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

   For this project, the Department requires the annual reporting of actual PM, PM_{10}, CO, NOx, SO_2 and VOC emissions for the following units: Remelt furnace, Holding furnace, No. 1 and No. 2 Homogenizing Furnaces.

   [Application 1090447-009-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

Subsection A. Surface Coating Operations

Subsection A. This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
001	Surface Coating Operations. *This emissions unit consists of one vertical wet paint booth. The surface coating is conducted by the application of coating to the metal surface using an electrostatic rotating head. Surface coating also includes associated activities, such as cleaning, mixing, and paint/solvent storage. Surface preparation is not included in this EU since the facility uses acid wash pretreatment process and it's not considered a volatile organic compounds (VOCs) emissions source.*

PERFORMANCE RESTRICTIONS

1. Permitted Capacity: The maximum volatile organic compound (VOC) containing coatings usage rate shall not exceed 8,375 gallons per 12 consecutive months. The maximum volatile organic compound (VOC) containing solvent usage rate shall not exceed 440 gallons per 12 consecutive months.

   Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

   [Permit No. 1090447-002-AC, Rules 62-210.200(PTE), 62-210.200(definitions), & 62-4.070, F.A.C.]

2. Method of Operation: The owner or operator shall not use HAP containing solvents. The owner or operator may use HAP or non-HAP containing coatings.

   [Rules 62-210.200(PTE) & 62-4.070, F.A.C]

3. Hours of Operation: The hours of operation are not limited (8760 hours/year).

   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

WORK PRACTICE STANDARDS

4. All VOC-containing coatings, solvent and waste materials shall be stored in closed containers, except when adding to, removing, or mixing the contents.

   [Rule 62-296.320 (1) and 62-4.070, F.A.C.]

COMPLIANCE DEMONSTRATION

5. By the end of the following calendar month, the owner or operator shall determine the total coating and solvent usages for the month (i.e. – Permittee shall determine February usage by the end of March). The owner or operator shall also determine the 12 month rolling sum of coating and also solvent usage by summing the monthly coating and solvent usage for the previous 12 consecutive months. The 12 consecutive month sum of coating and solvent usage shall be used to demonstrate compliance with the coating and solvent usage rate limitation as stated in Specific Condition No. 1 of this subsection.

   [Rule 62-4.070, F.A.C.]

6. The owner or operator shall use the information from the supplier or manufacturer to demonstrate that each solvent used for the unit does not contain HAP.

   [Rule 62-4.070, F.A.C.]

RECORDKEEPING & REPORTING

7. Recordkeeping: The owner or operator shall keep the following records:

   a. The name and volume of each VOC containing coating & solvent used. The owner or operator shall keep the purchase records for each coating & solvent used to support the record of the volume used.

   b. Information from the supplier or manufacturer demonstrates that each solvent used does not contain HAP.

   c. Information from the supplier or manufacturer specifying the VOC and HAP content of each VOC containing coating.

   d. Information from the supplier or manufacturer specifying the VOC content of each VOC containing solvent.

   e. The total volume of VOC containing coating & solvent used each month.

   f. The total volume of VOC containing coating & solvent used for 12-consecutive months.

   g. The total volume of HAP containing coating used each month.

   h. The total volume of HAP containing coating used for 12-consecutive months

   The owner or operator shall keep the records described above for a period of at least 5 years.

   [Rules 62-4.070 and 62-213.440(1)(b), F.A.C.]

8. Reporting: The owner or operator shall estimate the individual HAP and total HAPs emissions each year and report the emissions in Annual Operating Report (AOR).

   [Rule 62-4.070, F.A.C.]

Subsection B. Remelt & Holding Furnaces

This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
003	Holding Furnace *The Holding Furnace is used as a holding furnace for molten aluminum processed in the Remelt Furnace. The Holding Furnace or the "North furnace" is manufactured by Thorpe Technologies. It has one emissions point (stack height: 51' 4", inside diameter 67") and the emissions are uncontrolled. The holding furnace is a Group 2 furnace as defined in 40 CFR 63.1503.* *The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.*
004	Remelt Furnace *The Remelt Furnace is a melting furnace authorized to process either clean charge* or *aluminum that contains paint, lubricants, coatings, or other foreign materials. The Remelt Furnace or the "South furnace" is manufactured by Thorpe Technologies. It has two emissions points. One of the emissions points (stack height: 55', inside diameter: 27") is equipped with a wet scrubber (Manufactured by Turner EnviroLogic, Inc.). The second emissions point (stack height: 51' 4", inside diameter: 67") is not equipped with a control device. The Remelt Furnace can operate as either a Group 1 or Group 2 furnace as defined by 40 CFR 63.1503.* *The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.*
010	In-line Fluxer *The In-line fluxer processes molten aluminum from the Holding Furnace (Emissions Unit 003). The in-line fluxer uses only nonreactive, non-HAP-containing/non-HAP-generating gases or agents.* *The unit is subject to 40 CFR 63, Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.*

PERFORMANCE RESTRICTIONS

1. Maximum Heat Input Rate: The maximum heat input rate for each emissions unit is 36 MMBtu/hour. Both emissions units are permitted to use natural gas and liquefied propane gas (LPG) as fuels.

   [Rule 62-210.200(PTE), F.A.C. and Permit No.1090447-008-AC]

2. Permitted Capacity:

   a. Remelt Furnace: The maximum feed/charge[1] shall not exceed 30 tons per operating cycle[2]. The maximum annual feed/charge shall not exceed 80,000 tons per 12 consecutive months.

   b. Holding Furnace: The Holding Furnace operates in series with the Remelt Furnace and shall not operate independently (refer to Specific Condition No. 3.b.). Therefore the feed/charge rate of the Holding Furnace is assumed to be the same or less than the Remelt Furnace.

Specific Condition No. 2. Continued:

[1] *Feed/charge* means, for a furnace or other process unit that operates in batch mode, the total weight of material (including molten aluminum, T-bar, sow, ingot, etc.) and alloying agents that enter the furnace during an operating cycle. For a furnace or other process unit that operates continuously, *feed/charge* means the weight of material (including molten aluminum, T-bar, sow, ingot, etc.) and alloying agents that enter the process unit within a specified time period (*e.g.,* a time period equal to the performance test period).

[2] *Operating cycle* means the period including the charging and melting of scrap aluminum and the fluxing, refining, alloying, and tapping of molten aluminum (the period from tap-to-tap).

[Rule 62-210.200(PTE), F.A.C., 40 CFR 63.1503 (definition: feed/charge and operating cycle), Rule 62-212.400(12), F.A.C., and Application No. 1090447-009-AC; Applicant Comments received 8/30/10]

3. Method of Operation:

   a. Remelt Furnace: The Remelt Furnace is authorized to process either clean charge **OR** up to 35% (by weight of the total charge mixture), aluminum that contains paint, lubricants, coatings, or other foreign materials.

   b. Holding Furnace: The Holding Furnace is only authorized to hold or process clean charge as defined by 40 CFR 63.1503 (molten aluminum received from the Remelt Furnace) and alloying elements added directly to the Holding Furnace.

   Pursuant to 40 CFR 63.1503, Clean charge means furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or higher, and runaround scrap.

   [Rule 62-210.200(PTE), F.A.C., Permit No. 1090447-002-AC; Applicant Comments received 8/30/10; Revised Application No. 1090447-009-AC received 9/27/10]

4. Remelt Furnace – Control Device-Wet Scrubber: 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.

   Opacity:

   1. Pending Department review and approval of the results of the opacity test as required in Specific Condition No. 10 of this permit, the Permittee may operate the Remelt Furnace without the wet scrubber in operation when clean charge is being processed in the Remelt Furnace.

   2. With the exception of the performance test authorized in Specific Condition 8. of this permit, the wet scrubber shall be in operation at all times when aluminum that contains paint, lubricants, coatings, or other foreign materials is being processed in the Remelt Furnace. Specifically, the wet-scrubber shall operate during the charging of aluminum that contains paint, lubricants, coatings, or other foreign materials, from the beginning of the charge for a minimum of 30 minutes after the

Specific Condition No. 4. Continued:

charge door closes following the last push of charge material.

[Rules 62-210.650, and 62-4.070, F.A.C.; Applicant Comments received 8/30/10; Revised Application No. 1090447-009-AC received 9/27/10]

5. Hours of Operation: The hours of operation of each emissions unit are not limited (8760 hours per year).

   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS & OPERATING REQUIREMENTS

6. The furnaces are subject to 40 CFR 63, Subpart RRR. The applicable requirements are stated in the Draft Permit No. 1090447-010-AV.

   [40 CFR 63.1500]

7. The particulate matter (PM) and hydrogen chloride (HCl) emissions limits as stated in Conditions B.5., B.6., C.5., & C.6. of Title V Operation Permit No. 1090447-005-AV will be removed from the Title V permit by the terms of this construction permit.

   [Application No. 1090447-009-AC]

TEMPORARY PROJECT ACTIVITIES – PERFORMANCE TESTING

8. Remelt Furnace - Performance Test for Dioxin/Furan (D/F): For the purpose of this project, the owner or operator may conduct a single performance test for dioxin/furans using EPA Method 23 in Appendix A of 40 CFR 60 at the Remelt Furnace without the wet scrubber in operation during the performance test.

   The performance test shall be conducted in accordance with the requirements in 40 CFR 63.1511 and while the Remelt Furnace is:

   1) operating at a feed/charge of 30 tons per operating cycle, and
   2) processing 35% (by weight of the total charge mixture) aluminum that contains paint, lubricants, coatings, or other foreign materials.

   The performance test shall consist of three separate runs and the pollutant sampling for each run shall be conducted over the entire process operating cycle.

   The purpose of this performance test is to allow the Permittee the opportunity to demonstrate that the 40 CFR 63 Subpart RRR standards for dioxin/furan can be met at the Remelt Furnace without the use of the wet scrubber.

   Upon completion of this dioxin/furan test, the Permittee shall resume operation of the wet scrubber with the Remelt Furnace unless otherwise stated by the Department in a written Determination. Specifically, the wet-scrubber shall operate during the charging of charge/feed materials, from the beginning of the charge for a minimum of 30 minutes after the charge door closes following the last push of charge material.

Specific Condition No. 8. Continued:

The Department's Rule 62-210.650, F.A.C. – Circumvention, shall not apply during this performance test.

[Application No. 1090447-009-AC; Applicant Comments received 8/30/10; Revised Application No. 1090447-009-AC received 9/27/10]

9. Site Specific Test Plan: Prior to conducting the performance test as described by Specific Condition No. 8., the owner or operator shall prepare and submit to the Department a site-specific test plan in accordance with 40 CFR 63.7(c)(2). The Department will approve or disapprove the submitted test plan in accordance with 40 CFR 63.7(c)(3).

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

10. Remelt Furnace -Performance Test for Visible Emissions: For the purpose of this project, the owner or operator may conduct a single opacity test for the Remelt Furnace without the wet scrubber in operation during the opacity test. The opacity limitation is as stated in the Draft Title V Operation Permit No. 1090447-010-AV, i.e. shall not exceed 20% opacity.

    The opacity test shall be conducted while the Remelt Furnace is processing only clean charge and is operating at a feed/charge of 30 tons per operating cycle.

    The duration of the test shall be at least 1 hour and up to the entire operating cycle, and shall be conducted from the beginning of the operating cycle. The test method shall be EPA Method 9, adopted by reference in Rule 62-204.800, F.A.C.

    Upon completion of this opacity test, the Permittee shall resume operation of the wet scrubber with the Remelt Furnace unless otherwise stated by the Department in a written Determination. Specifically, the wet-scrubber shall operate during the charging of charge/feed materials, from the beginning of the charge for a minimum of 30 minutes after the charge door closes following the last push of charge material.

    The Department's Rule 62-210.650, F.A.C. – Circumvention, shall not apply during this opacity test.

    [Application No. 1090447-009-AC, and Rule 62-4.070, F.A.C.; Applicant Comments received 8/30/10]

11. Performance Test & Visible Emission Observation Notifications:

    a. As required by §63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Department of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.

    b. The owner or operator shall notify the Department, 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 test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit

    [Rule 62-297.310(7)(a)9., F.A.C.; 40 CFR 63.1515(a)(6)]

RECORDS

12. Remelt Furnace -Wet Scrubber Operating Status: The owner or operator shall maintain records of the operating status of the wet scrubber (time, date, on/off status). During the time when the scrubber is not operating and the material is charged to the furnace, the owner or operator shall record the amount of the clean charge and confirm that all such material meet the definition of clean charge per 40 CFR 63.1503.

    [Rule 62-4.070, F.A.C.]

13. Remelt Furnace Operating Rate: The owner or operator shall measure and record the following information:

    a. The total weight of the feed/charge to the Remelt Furnace for each operating cycle.

    b. The sum of total weight of the feed/charge to the Remelt Furnace each month. The 12 months rolling sum of the total weight of aluminum processed by summing the monthly total weight of aluminum processed for the previous 12 consecutive months.

    c. The weight of the feed/charge to the melting furnace of aluminum that contains paint, lubricants, coatings, or other foreign materials for each operating cycle, and the record as percent (%) by weight of the total charge mixture for each operating cycle.

    [Rule 62-4.070, F.A.C.]

REPORTS

14. Performance Test & Visible Emission Observation Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.

    [Rule 62-297.310(8), F.A.C.]

REVISIONS TO PREVIOUSLY ISSUED PERMITS NOS. 1090447-001-AC, 1090447-003-AC, AND 1090447-006-AC

15. Remelt Furnace (Emissions Unit 004): Specific Condition D.1. of Permit No. 1090447-001-AC, Specific Condition D.1. of Permit No. 1090447-003-AC and Specific Condition C.1. of 1090447-006-AC are revised to Specific Condition Nos. 2.a. and 3.a. of Subsection B of this construction permit.

    [Revised Application No. 1090447-009-AC received 9/27/10; Rules 62-4.070(3) and 62-4.080, F.A.C.]

Subsection C. No. 1 & No. 2 Homogenizing Furnaces, OPC Age Oven, and OPC Workshop

This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
005	No. 1 & No. 2 Homogenizing Furnaces *The furnaces are for heat treatment of the aluminum logs to achieve uniform grain size in the metal prior to saw cut. The furnaces are propane and natural gas fired with maximum heat input rate of each furnace rated at 36 MMBtu/hour. Each furnace has one emissions point and the emissions are uncontrolled.*
007	OPC Age Oven *Aluminum tubes from OPC solvent tank are heat treated in OPC age oven. The oven is natural gas and propane fired and the maximum heat input rate is rated at 4 MMBtu/hour.*
008	OPC Workshop *This unit involves miscellaneous fabrication activities.*

MODIFICATION

1. For EU 005, all the requirements in the subsection D, section III of permit No.1090447-005-AV will be removed from the Title V Permit by the terms of this construction permit. Both Homogenizing furnaces will be classified as unregulated emissions units and listed in Appendix U-1 of draft permit No. 1090447-010-AV.

   [Application No.1090447-009-AC]

2. For EU 007, all the requirements in the subsection F, section III of permit No. 1090447-005-AV will be removed from the Title V Permit by the terms of this construction permit. The OPC Age Oven will be classified as an insignificant emissions unit and listed in Appendix I-1 of draft permit No. 1090447-010-AV.

   [Application No.1090447-009-AC]

3. For EU 008, all the requirements in the subsection G, section III of permit No.1 090447-005-AV will be removed from the Title V Permit by the terms of this construction permit. The OPC workshop will be classified as insignificant emissions unit and listed in Appendix I-1 of draft permit No. 1090447-010-AV.

   [Application No.1090447-009-AC]

Subsection D. OPC Solvent Tank

This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
006	OPC Solvent Tank *Aluminum tubes are immersed in the aliphatic organic solvent in the tank to remove grease. The solvent tank has the following dimensions (W x H x L): 50″ x 54″ x 425″.*

PERFORMANCE RESTRICTION

1. Hours of Operation: The hours of operation of are not limited (8760 hours per year).

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C.]

2. Permitted Capacity: The solvent usage rate is limited to 12,450 gallons per 12 consecutive months.

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C., Application No.1090447-009-AC]

3. Method of Operation: The owner or operator shall not use HAP containing solvent.

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C., Application No.1090447-009-AC]

COMPLIANCE DEMONSTRATION

4. By the end of the following calendar month, the owner or operator shall determine the total solvent usage for the month (i.e. – Permittee shall determine February usage by the end of March). The owner or operator shall also determine the 12 month rolling sum of solvent usage by summing the monthly solvent usage for the previous 12 consecutive months. The 12 consecutive month sum of solvent usage shall be used to demonstrate compliance with the solvent usage rate limitation as stated in Specific Condition No. 2 of this subsection.

   [Rule 62-4.070, F.A.C.]

5. The owner or operator shall use the information from the supplier or manufacturer to demonstrate that each solvent used for the unit does not contain HAP.

   [Rule 62-4.070, F.A.C.]

RECORDKEEPING

6. Recordkeeping: The owner or operator shall keep the following records:

   a. The name and volume of solvent used. The owner or operator shall keep the purchase records for each solvent used to support the record of the volume used.

Specific Condition No. 6. Continued:

b. Information from the supplier or manufacturer demonstrates that each solvent used does not contain HAP.

c. The total volume of solvent used each month.

d. The total volume of solvent used for 12-consecutive months.

The owner or operator shall keep the records described above for a period of at least 5 years.

[Rule 62-4.070 and 62-213.440(1)(b), F.A.C.]

Subsection E. GDT Solvent Tank

This section of the permit addresses the following emissions unit/units.

ID No.	Emission Unit Description
009	GDT Solvent Tank *Solvent is used in the cleaning tank to remove the cutting oil from aluminum parts. The parts are then heat-treated in the # 3 and #4 Age Ovens. The solvent tank has the following dimensions (W x H x L): 61.5″ x 60″ x 516″.*

PERFORMANCE RESTRICTION

1. Hours of Operation: The hours of operation of are not limited (8760 hours per year).

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C.]

2. Permitted Capacity: The solvent usage rate is limited to 33,815 gallons per 12 consecutive months.

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C., Application No.1090447-009-AC]

3. Method of Operation: The owner or operator shall not use HAP containing solvent.

   [Rules 62-4.070(3) and 62-210.200 (PTE), F.A.C., Application No.1090447-009-AC]

COMPLIANCE DEMONSTRATION

4. By the end of the following calendar month, the owner or operator shall determine the total solvent usage for the month (i.e. – Permittee shall determine February usage by the end of March). The owner or operator shall also determine the 12 months rolling sum of solvent usage by summing the monthly solvent usage for the previous 12 consecutive months. The 12 consecutive months sum of solvent usage shall be used to demonstrate compliance with the solvent usage rate limitation as stated in specific condition No.2 of this subsection.

   [Rule 62-4.070, F.A.C.]

5. The owner or operator shall use the information from the supplier or manufacturer to demonstrate that each solvent used for the unit does not contain HAP.

   [Rule 62-4.070, F.A.C.]

RECORDKEEPING

6. Recordkeeping: The owner or operator shall keep the following records:

   a. The name and volume of solvent used. The owner or operator shall keep the purchase records for each solvent used to support the record of the volume used.

Specific Condition No. 6. Continued:

b. Information from the supplier or manufacturer demonstrates that each solvent used does not contain HAP.

c. The total volume of solvent used each month.

d. The total volume of solvent used for 12-consecutive months.

The owner or operator shall keep the records described above for a period of at least 5 years.

[Rule 62-4.070 and 62-213.440(1)(b), F.A.C.]