Hydro Aluminum of North America, Inc.
St. Augustine Facility
Facility ID No.: 1090447
St. Johns County

Title V Air Operation Permit

Proposed Permit No.: 1090447**-005-AV**
(Formerly VAW of America, Inc.)

Permitting Authority:
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32056-7590
Telephone: 904-807-3300
Fax: 904-448-4363

Compliance Authority:
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32056-7590
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Department of
Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Jeb Bush
Governor

Colleen Castille
Secretary

Permittee:
HALNA, Inc.
St. Augustine Plant
200 Riviera Boulevard

Proposed Permit No.: 1090447-005-AV
Facility ID No.: 1090447
SIC No(s).: 33
Project: Title V Air Operation Permit Revision

This permit revision is being issued for the purpose of incorporating the terms and conditions of the air construction permits, No. 1090447-006-AC. This facility is located at 200 Riviera Boulevard, St. Augustine, St. Johns County; UTM Coordinates: Zone 17, 470.98 km East and 3296.85 km North; and, Latitude: 29°48'13" North and Longitude: 81°18'01" West.
This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213.
The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS
40 CFR 60, Subpart A- General Provisions
40 CFR 63, Subpart RRR

Initial Effective Date:
Renewal Application Due Date:
Expiration Date:

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

CLK:KAA

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This Hydro Aluminum of America, Inc. facility consists of remelt furnaces, homogenizers, paint spray operations, cleaning tanks and an Aluminum tube extrusion workshop.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the unsolicited information received August 18, 1998 during the initial Title V permitting process, this facility is synthetic minor source of hazardous air pollutants (HAPs). Based on the initial Title V application received June 14, 1996, this facility is a major source of VOC's.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Painting Facility with five paint booths, a bake oven and a pyrolysis furnace
003	Remelt Furnace No. 1
004	Remelt Furnace No. 2
005	Homogenizing Furnaces Nos. 1 and 2 with two EP's
006	OPC Solvent Tank
007	OPC Age Oven
008	Workshop
009	140 Solvent Storage Tank and #3 and #4 Age Oven

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1: Permit History

These documents are on file with the permitting authority:
Title V Air Operation Permit Application Received March 3, 2006
Initial Title V Air Operation Permit issued December 28, 1998
Department Reopen For Cause Letter dated November 15, 2002

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, Maryland 20703-1515
Telephone: 301/429-5018

and,
b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C]

8. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57. of APPENDIX TV-5, TITLE V CONDITIONS):

a. the application of wetting agents to the gypsum stockpile, as needed
b. the use of enclosed, covered, and semi-enclosed conveyors as needed
c. maintaining paved parking areas
d. reduced speed for vehicular traffic
e. and the implementation of good housekeeping practices.

[Rule 62-296.320(4)(c)2., F.A.C.; and, 1070039-001-AC]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

10. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-5, TITLE V CONDITIONS)}

11. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District Office.

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256
Telephone: 904/807-3200
Fax: 904/448-4366

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

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

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

SECTION III. EMISSIONS UNIT(S) AND CONDITIONS.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-001	Painting Facility with five paint booths, a bake oven and a pyrolysis furnace

Emission Unit 001 identifies a R & D booth (EP 1), a primer booth (EP2) with dry filter, horizontal booth (EP3) with dry filters, a vertical booth (EP6) with dry filter, a bake oven (EP7), and a pyrolysis furnace (EP8) with an afterburner to destroy VOC emissions.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Methods of Operation - (i.e. Fuels). A maximum of 21.7 gallons/hour of propane fuel shall be used in the Bake Oven (EP6) and 3.8 gallons/ hour in the pyrolysis furnace (EP8).
[Rule 62-213.410, F.A.C.; and, Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC]

A.2. Methods of Operation - (i.e. Paint Content). A maximum of 8,375 gallons of liquid VOC/HAP containing paint shall be used at this emissions unit within a 12-month period.

a. No more than 4,000 gallons of this paint shall contain 69.2 percent volatiles or greater, or
b. No more than 350 gallons of this paint shall contain 5 percent MEK or greater, or
c. No more than 4,000 gallons of this paint shall contain 25 percent Xylene or greater.

[Rule 62-213.410, F.A.C.; and, Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

A.3. Methods of Operation - (i.e. Solvents). A maximum of 125 gallons of MEK and 800 gallons of Xylene shall be used at this emissions unit within a 12-month period.
[Rule 62-213.410, F.A.C.; and, Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

A.4. Hours of Operation. The hours of operation for the 5 paint booths and the bake oven (EP 1-6) shall not exceed 16 hours/day, 6 days/week, 50 weeks/year and 4800 hours/year. The hours of operation for the pyrolysis furnace (EP8) shall not exceed 2 hours/day, 6 days/week, and 50 weeks/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

Emission Limitations and Standards

A.5. Volatile Organic Compounds. VOC emissions shall not exceed 31.43 tons/year.
[Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

A.6. Methyl Ethyl Ketone. MEK emissions shall not exceed 0.5 tons/year.
[Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

A.7. Xylene. Xylene emissions shall not exceed 7.7 tons/year.
[Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC.]

Test Methods and Procedures

Recordkeeping and Reporting Requirements

Recordkeeping Requirements:

A.8. Recordkeeping. Compliance shall be determined by recording the following data for each material used (Refer to A.6. - A.8.) that contains either VOC, MEK, or Xylene.

Quantity
• Amount of Material Used (gallons) (Plant usage logs shall be maintained)
Emissions Factors
• VOC, MEK or Xylene Factor (Percentage by Weight) • Time Factor (Hours)
Emissions
• Total Cumulative Emissions (Tons)

[Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC]

Reporting Requirements:

A.9. Reporting. A report of the data required by Condition A.9. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).
[Title V permit No. 1090031-003-AV, Construction Permit No. 1090447-002-AC]

A.10. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection B. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-003	Remelt Furnace No. 1

Emission Unit 003 identifies melting furnace No.1 or North Furnace. Furnace No. 1 is currently being used as a holding furnace for aluminum after being melted in Furnace No. 2 (EU 004)

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum operation rate shall not exceed 25.0 tons per batch [1] and 62,500 tons/year of aluminum[2].

[1] The load rate shall not exceed 8.33 tons/ hour average per batch.

[2] The aluminum may be clean scrap or T-bar, or it may be a mixture of the aforementioned material and dealer scrap with the dealer scrap comprising no more than 50% of the total mixture.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1090447-002-AC]

B.2. Methods of Operation - (i.e. Fuels). A maximum of 150 gallons/ton average of Propane LPG [1] shall be used as the fuel.

[1] Based upon 90,000 Btu/gallon of LPG

[Rule 62-213.410, F.A.C.; and, Construction Permit Application May 3, 2004]

B.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-001-AC]

Emission Limitations and Standards

B.4. Visible Emissions shall not exceed 20% opacity.
[Construction Permit 1090013-001-AC]

B.5. Particulate Emissions: Particulate Emissions shall not exceed 4.69 TPY.
[Basis: 0.15 lb/ton, 40 CFR 63 Subpart RRR]

B.6. Hydrogen Chloride: HCL Emissions shall not exceed 3.13 TPY.
[Basis: 0.10 lb/ton, 40 CFR 63 Subpart RRR]

B.7. Dioxin/Furans: D/F Emissions shall not exceed 9.38E-07 tons/year.
[Basis: 3.00E-08 lb/ton, 40 CFR 63 Subpart RRR]

Test Methods and Procedures

B.8. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.
[Permit 1090013-001-AC.]

B.9. Particulate Matter. The test method for particulate matter emissions shall be EPA Method 5.

B.10. This emissions unit is also subject to conditions I.1. contained in Subsection I. NESHAPs Common Conditions.

B.11. This emissions unit is also subject to conditions J.1. Through J.7. Contained in Subsection J. Common Conditions.

Subsection C. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-004	Remelt Furnace No. 2

Emission Unit 004 identifies melting furnace No. 2 or South Furnace with two emission points: emission point 1, melting furnace No. 2 stack, and emission point 2, scrubber stack. The scrubber shall be maintained and fully operation during all charging.

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity. The maximum operation rate shall not exceed 25 tons per batch [1] and 62,500 tons/year of aluminum[2].

[1] The load rate shall not exceed 8.33 tons/hour average per batch.

[2] The aluminum may be clean scrap or T-bar, or it may be a mixture of the aforementioned material and dealer scrap with the dealer scrap comprising no more than 50% of the total mixture.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Construction Permit Application May 3, 2004.]

C.2. Methods of Operation - (i.e. Fuels). A maximum of 300 gallons/ton average of Propane LPG [1] shall be used as the fuel.

[1] Based upon 90,000 Btu/gallon of LPG

[Rule 62-213.410, F.A.C.; and, Construction Permit Application May 3, 2004]

C.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and Construction Permit 1090013-001-AC.]

Emission Limitations and Standards

C.4. Visible Emissions shall not exceed 20% opacity.
[Construction Permit 1090013-001-AC]

C.5. Particulate Emissions: Particulate Emissions shall not exceed 9.38 TPY.
[Basis: 0.3 lb/ton, Construction Permit Application May 3, 2004.]

C.6. Hydrogen Chloride: HCL Emissions shall not exceed 6.25 TPY.
[Basis: 0.2 lb/ton, 40 CFR 63 Subpart RRR]

C.7. Dioxin/Furans: D/F Emissions shall not exceed 9.38E-07 tons/year.
[Basis: 3.00E-08 lb/ton, 40 CFR 63 Subpart RRR]

Test Methods and Procedures

C.8. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.
[Permit 1090013-001-AC.]

C.9.Particulate Matter. The test method for particulate matter emissions shall be EPA Method 5.

Scrubber Conditions

C.10. The permittee shall provide proper sampling ports in the scrubber ducts/stack and permanent access to the sampling ports including work platforms, access to platforms, electrical power, and sampling equipment support as required by Rule 62-297, F.A.C. Detailed drawings showing the sampling ports, stack sampling platforms and sampling support equipment shall be submitted to the Department's Northeast District Office for approval at least 15 days prior to startup following completion of the melting furnace door replacement project. [Rule 62-297, F.A.C.]

C.11. The existing scrubber system shall be refurbished as necessary and operated/maintained as described in the Turner EnviroLogic Operating and Maintenance Manual dated December, 1996, during all charging and/or melting activities. The facility is responsible for protecting the integrity of the scrubber system, which may include the use of a high temperature alarm and quench system during periods of excessive exhaust duct temperatures.
[Rule 62-297, F.A.C.]

C.12. This emissions unit is also subject to conditions I.1. contained in Subsection I. NESHAPs Common Conditions

C.13. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection D. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-005	Homogenizing Furnace Nos. 1 and 2 with two EP's

Emission Unit 005 identifies two homogenizing furnaces Nos. 1 and 2 with two emission points: emission point 1, homogenizing furnace No. 1 stack, and emission point 2, homogenizing furnace No. 2 stack.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum operation rate shall not exceed 12.4 tons/hour and 62,500 tons/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Construction Permit Application May 3, 2004.]

D.2. Methods of Operation - (i.e. Fuels). A maximum of 800 gallons/hour and 1,875,000 gallons/year of Propane LPG [1] shall be used as the fuel.

[1] Based upon 90,000 Btu/gallon of LPG

[Rule 62-213.410, F.A.C.; and, Construction Permit 1090013-001-AC]

D.3. Hours of Operation. The hours of operation for this emissions unit shall not exceed 8760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-001-AC.]

Emission Limitations and Standards

D.4. Visible Emissions shall not exceed 20% opacity.
[Construction Permit 1090013-001-AC.]

Test Methods and Procedures

D.5. Visible Emissions. The test method for visible emissions shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C.
[Permit 1090013-001-AC.]

D.6. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection E. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-006	OPC Solvent Tank

Emission Unit 011 identifies the OPC Solvent Tank. Aluminum tubes are immersed in the aliphatic organic solvent in the tank to remove grease.

E.1. Permitted Capacity. The maximum solvent usage shall not exceed 13.33 pounds/ hour and 58.5 tons/year. [1]

[1] The solvent usage rate shall be determined from a weekly average based upon the equation: (solvent added - solvent sent to the vacuum still)/ time factor.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-002-AC]

E.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-002-AC.]

Emission Limitations and Standards

E.3. VOC**.** VOC Emissions shall not exceed 42.33 tons/year.
[Construction Permit 1090013-002-AC, Construction Permit No. 1090447-002-AC.]

Recordkeeping and Reporting Requirements

E.4. Recordkeeping. Compliance shall be determined by recording the following data during all times of operation.

a) Solvent usage (Pounds/hour and Tons/year)

[Permit 1090013-002-AC, Construction Permit No. 1090447-002-AC]

E.5. Reporting. A report of the data required by Condition F.4. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).
[Construction permit 1090013-002-AC]

E.6. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection F. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-007	OPC Age Oven

Emission Unit 007 identifies the OPC Age Oven. Emissions from this emissions unit include the solvent carried-over with the aluminum tubes from the OPC Solvent tank and the combustion products of the LPG.

Essential Potential to Emit (PTE) Parameters

F.1. Methods of Operation - (i.e. Fuels). Maximum of 30 gallons/hour of LPG.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Construction Permit 1090013-002-AC.]

F.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-002-AC]

Emission Limitations and Standards

F.3. VOC. VOC Emissions shall not exceed 6.49 tons/year.
[Construction Permit 1090013-002-AC, Construction Permit No. 1090447-002-AC.]

Test Methods and Procedures

F.4. Recordkeeping. Compliance shall be determined by recording the following data during all times of operation.

a) LPG usage in the Age Oven (Gallons/year)

[Permit 1090013-002-AC, Construction Permit No. 1090447-002-AC]

Reporting Requirements:

F.5. Reporting. A report of the data required by Condition G.4. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).
[Construction Permit 1090013-002-AC. Construction Permit No. 1090447-002-AC].

F.6. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection G. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
-008	Workshop

Emission Unit 008 identifies the OPC Workshop.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

G.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Construction Permit 1090013-002-AC]

Emission Limitations and Standards

G.2. VOC. VOC Emissions shall not exceed 7.86 tons/year.
[Construction Permit 1090013-002-AC, Construction Permit No. 1090447-002-AC]

G.3. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection H.: This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
009	140 Solvent Tank and #3 and # 4 Age Ovens

140 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. VOC are emitted from the solvent tank and through the age oven stacks.

H.1. Hours of Operation. The hours of operation for this emissions unit shall not exceed 24 hours/day, 6 days/week, 52 weeks/year and 7,488 hours/year.
[Rule 62-210.200(PTE), F.A.C.; and, Title V permit No. 1090031-003-AV.]

Emission Limitations and Standards

H.2. Volatile Organic Compounds. VOC emissions shall not exceed 113.62 tons per year.
[Title V permit No. 1090031-003-AV]

Test Methods and Procedures

Recordkeeping and Reporting Requirements

H.3. Recordkeeping. Compliance shall be determined by recording the following data during all times of operation.

b) Amount of 140 solvent used in process (gallons/year)

H.4. Reporting. A report of the data required by Condition I.4. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).

H.5. This emissions unit is also subject to conditions J.1. through J.7. contained in Subsection J. Common Conditions.

Subsection I. NESHAPs Common Conditions.

E.U. ID No.	Brief Description
-003	Remelt Furnace No. 1
-004	Remelt Furnace No. 2

The following conditions apply to the NESHAPs emissions units listed above:

40 CFR 63, Subpart A - General Provisions Requirements

I.1. NESHAPs Requirements: The owner or operator of an existing affected source must comply with the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Production of Subpart RRR in 40 CFR 63. This facility shall also comply with the General Provisions of 40 CFR 63 Subpart A, as applicable. The applicable NESHAPs requirements are provided in Appendix RRR of this permit.
[Rule 62-213.440(1), F.A.C. & 40 CFR 63.1501(a)]

Subsection J. Common Conditions.

E.U. ID No.	Brief Description
-001	Painting Facility with five paint booths, a bake oven and a pyrolysis furnace
-002	Powder Paint Booth with cyclone and baghouse
-003	Remelt Furnace No. 1
-004	Remelt Furnace No. 2
-005	Homogenizing Furnaces Nos. 1 and 2 with two EP's
-006	OPC Solvent Tank
-007	OPC Age Oven
-008	Workshop
-009	140 Solvent Storage Tank and #3 and #4 Age Oven

The following conditions apply to the emissions unit(s) listed above:

Recordkeeping and Reporting Requirements

J.1. Recordkeeping. Compliance shall be determined by recording the total emissions for each pollutant

J.2. Reporting. A report of the data required by Condition J.5. shall be submitted to the Northeast District Office on a quarterly basis. All quarterly reports shall be postmarked no later than the 45th day following the end of the reporting period defined below:

Reporting Period	Report Due Date
January - March	May 15
April - June	August 15
July - September	November 15
October - December	March 1

The annual operating report for that calendar year shall be submitted in lieu of the October-December quarterly report. The fourth quarterly report shall be due on March 1 of the following calendar year (Same date as the AOR).

J.3. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.
(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid and/or solid fuel for a total of no more than 400 hours.

4. During each federal fiscal year (October 1 -- September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:

a. Visible emissions, if there is an applicable standard;

9. 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.

10.(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7), F.A.C.; and, **SIP approved**]

J.4. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling port shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

a. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

b. The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
[Rule 62-297.310(4)(a)2., F.A.C.]

J.5. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters,

and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

J.6. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the

certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.
[Rule 62-297.310(8), F.A.C.]

J.7. Visible Emissions test method shall be EPA Method 9 (40 CFR 60, Appendix A) adopted by reference in Chapter 62-297.401, F.A.C.
Compliance Test Methods. The EPA test methods and quality assurance procedures listed in this rule and contained in 40 CFR Part 51, Appendix M, 40 CFR Part 60, Appendix A and F, 40 CFR Part 61, Appendix B and C, and 40 CFR Part 63, Appendix A, are adopted and incorporated by reference in Rule 62-204.800, F.A.C. The EPA test methods that are adopted by reference in Rule 62-204.800, F.A.C., are adopted in their entirety except for those provisions referring to approval of alternative procedures by the Administrator. For purposes of this rule, such alternative procedures may only be approved by the Secretary or his or her designee in accordance with Rule 62-297.620, F.A.C.

(9)(a) EPA Method 9 -- Visual Determination of the Opacity of Emissions from Stationary Sources -- 40 CFR 60 Appendix A.

(b) Alternate Method 1 -- Determination of the Opacity of Emissions from Stationary Sources Remotely by Lidar -- 40 CFR 60 Appendix A.

(c) DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.

2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:

a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.

b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]