

Facility Name: **Tifton Aluminum Company Inc.**
 City: Tifton
 County: Tift
 AIRS #: 04-13-277-00012

Application #: TV-14986
 Date Application Received: January 20, 2004
 Permit No: 3354-277-0012-V-02-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Tifton Aluminum Company, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Tifton Aluminum Co., Inc.
2. Parent/Holding Company Name: Aluminum Company of America
3. Previous and/or Other Name(s): No previous names were identified
4. Facility Location: 250 Southwell Blvd., Tifton, Georgia 31794
5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in Tifton County, an attainment area for all criteria pollutants.

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area.

B. Site Determination

There are no applicable issues with regards to site determination. There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, current permits, of the Title V application and the "permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3354-277-0012-V-01-0	July 19, 1999	Initial Title V Permit
3354-277-0012-V-01-0	Nov. 29, 1999	Off permit change involving replacement of east and west anodizing boilers
3354-277-0012-V-01-0	July 19, 2002	Off permit change involving removal of a rinse tank and four die cleaning tanks and installation of a rinse tank and three die cleaning tanks.
3354-277-0012-V-01-1	Nov. 17, 2004	502b(10) permit amendment allowing use of fluoridated flux and a painting booth VOC cap of 95 tons/year.

D. Process Description

1. SIC Codes: 3354 – Aluminum Extruded Products

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces extruded aluminum architectural and other building products.

3. Overall Facility Process Description

The facility receives aluminum scrap and aluminum ingots. The aluminum scrap is melted in one of two melting or reverberatory furnaces. The two furnaces process scrap aluminum and clean charge materials. A degassing flux is added to each furnace and inline fluxer during the melting process to remove soluble gases and impurities from the molten aluminum and then the aluminum is cast into logs. The logs are also heated and then extruded through steel dies into aluminum parts. A portion of these extruded aluminum parts are sold. Another portion of the aluminum parts are painted in two large paint booths. The remaining parts are surface treated in a series of anodizing baths to give the surfaces different finishes.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a true minor source under the PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes			✓
PM ₁₀	yes			✓
SO ₂	yes			✓
VOC	yes		✓	
NO _x	yes	✓		
CO	yes			✓
TRS	yes			✓
H ₂ S	yes			✓
Individual HAP	yes	✓		
Total HAPs	yes	✓		

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart RRR (NESHAPs for Secondary Aluminum Production). The facility is subject to 40 CFR 63, Subpart MMMM (NESHAPs for Surface Coating of Miscellaneous Metal Parts and Products). The compliance date for Subpart MMMM is January 2, 2007. The facility has some small fuel burning equipment consisting of several small ovens, two boilers rated at 5 MMBtu/hour and two dryers. This equipment is classified as small fuel burning equipment, fired with natural gas or fuel oil. These units are not subject to Subpart DDDDD (NESHAPs for industrial, commercial, and institutional boilers and process heaters) since the heat input of these fuel burning equipment are less than 10 MMBtu/hr.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

The facility is subject to 40 CFR 63, Subpart RRR, "*Secondary Aluminum Production*" and 40 CFR 63, Subpart MMMM, "*Surface Coating of Miscellaneous Metal Parts and Products*". The secondary aluminum MACT standards became effective on March 24, 2003. The surface coating MACT was promulgated on January 2, 2004 with a compliance date of January 2, 2007 for existing sources. The facility's initial Title V Permit did not incorporate the secondary aluminum or the surface coating MACT requirements and conditions.

C. Compliance Status

The renewal Title V Permit Application indicates compliance with all applicable rules and regulations. Please Section VII.F for more details.

D. Operational Flexibility

The Permittee was authorized to use fluoridated flux in the degassing operation in the melting furnace and inline fluxer in a 502b(10) permit amendment on November 17, 2004. The applicable regulations, specified above apply for the various alternate operating scenarios.

E. Permit Conditions

Conditions 2.2.1 and 2.2.2 require the facility to comply with all applicable provisions of the secondary aluminum MACT and the General Provisions of 40 CFR 63, Subpart A. These are new conditions in the renewed permit. The facility's current Title V Permit does not incorporate requirements of the secondary aluminum MACT or the surface coating MACT. New Condition 2.2.3 requires the facility to comply with all applicable provisions of the surface coating MACT (40 CFR 63, Subpart MMMM).

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in Section I. of this narrative. The only change to the process description since the issue of the initial Title V Permit in 1999 is the approval to use fluoridated fluxes in the degassing operations in the melting furnace and in the inline fluxer in November 2004.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Rules and Regs Federally Enforceable
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	
F115	Reverberatory Melt Furnace No. 1	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & RRR	2.2.1, 2.2.2, 3.2.1, 3.3.1, 3.3.2, 3.3.4 to 3.3.8, 3.4.1, 3.4.2, 4.2.1 to 4.2.9, 5.2.5, 5.2.6, 5.2.7, 5.3.1 to 5.3.7, 6.1.7, 6.2.1, 6.2.8, 6.2.9, 6.2.10, 6.2.12, 6.2.13	Yes
F125	Reverberatory Melt Furnace No. 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & RRR	2.2.1, 2.2.2, 3.2.1, 3.3.1, 3.3.2, 3.3.4 to 3.3.8, 3.4.1, 3.4.2, 4.2.1 to 4.2.9, 5.2.5, 5.2.6, 5.2.7, 5.3.1 to 5.3.7, 6.1.7, 6.2.1, 6.2.8, 6.2.9, 6.2.10, 6.2.12, 6.2.13	Yes
PIF1	Inline Fluxer No. 1	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & RRR	2.2.1, 2.2.2, 3.3.3 to 3.3.6, 3.3.8, 3.4.1, 3.4.2, 4.2.1 to 4.2.9, 5.2.5, 5.2.6, 5.2.7, 5.3.1 to 5.3.7, 6.1.7, 6.2.1, 6.2.8, 6.2.9, 6.2.10, 6.2.12, 6.2.13	Yes
PIF2	Inline Fluxer No. 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & RRR	2.2.1, 2.2.2, 3.3.3 to 3.3.6, 3.3.8, 3.4.1, 3.4.2, 4.2.1 to 4.2.9, 5.2.5, 5.2.6, 5.2.7, 5.3.1 to 5.3.7, 6.1.7, 6.2.1, 6.2.8, 6.2.9, 6.2.10, 6.2.12, 6.2.13	Yes
D205	Die Cleaner Caustic Bath No. 1	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
D206	Die Cleaner Caustic Bath No. 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
D207	Die Cleaner Caustic Bath No. 3	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
P405	Paint Mix Room	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & Mmmm	2.2.1, 2.2.3, 3.3.9 to 3.3.12, 3.4.1, 3.4.2, 6.1.5, 6.1.7, 6.2.6, 6.2.7, 6.2.8, 6.2.11, 6.2.14, to 6.2.22	Yes

Emission Units		Specific Limitations/Requirements		Rules and Regs Federally Enforceable
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	
P430	Paint Booths	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & MMMM	2.2.3, 3.2.2, 3.3.9 to 3.3.12, 3.4.1, 3.4.2, 6.1.7, 6.2.2 to 6.2.7, 6.2.11, 6.2.14, through 6.2.22	Yes
P435	Flash-Off Conveyor	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & MMMM	3.3.9 to 3.3.12, 3.4.1, 3.4.2, 6.1.7, 6.2.7, 6.2.11, 6.2.12, 6.2.14, through 6.2.22	Yes
P440	Paint Bake Oven	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) 40 CFR 63, Subparts A & MMMM	3.3.9 to 3.3.12, 3.2.1, 3.4.1, 3.4.2, 6.1.7, 6.2.7, 6.2.11, 6.2.8, 6.2.12, 6.2.14, through 6.2.22	Yes
A561	Anodizing Tank No. 1	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
A562	Anodizing Tank No. 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
A563	Anodizing Tank No. 3	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes
A564	Anodizing Tank No. 4	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.1 to 5.2.4, 6.1.7	Yes

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3354-277-0012-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. In addition, the two reverberatory furnace and the two inline fluxers are subject to the Secondary Aluminum Production MACT (40 CFR 63 Subpart RRR). The paint mix room, paint booths, flash-off conveyor and the paint bake oven are subject to the surface coating MACT (40 CFR 63 Subpart MMMM).

40 CFR 63, Subpart MMMM, “*Surface Coating of Miscellaneous Metal Parts and Products*”, applies to any facility that is a major source for hazardous air pollutants, engages in the application of surface coatings to miscellaneous metal parts and products, and are not specifically regulated by another coating NESHAP. The facility has potential to emit HAPs in amounts greater than 25 tpy and is therefore a major source of HAPs. Tifton also has paint booths and applies coatings to metal (cast aluminum) parts.

This rule specifically places limits on the emissions of hazardous air pollutants from equipment that is used to prepare metal substrates for coating, equipment used to apply coating, equipment used to dry or cure coatings after application and equipment used to clean coating equipment. The facility may choose from one of four options (compliant material, emission rate without add-on control equipment, predominant activity option or the facility-specific emission limit option) in order to comply with Subpart MMMM emission limits. If the facility uses coating subject to different Subpart MMMM subcategory emission limits, the facility may: (1) comply with each subcategory emission limit separately, (2) comply with the emission limits for the predominant activity, or (3) comply with a facility-specific emission limit. The predominant activity cannot be high performance coating, rubber-to-metal coating, or extreme performance fluoropolymer coating. The dominant activity must account for 90% or more of surface coating activity (in gallons of coating solids as determined by usage and volume solids content). Predominant activity must be demonstrated initially and annually thereafter. The initial predominant activity calculations must be submitted with the initial notification. The predominant activity demonstration must include at least a year of data. The facility must comply with this rule no later than January 2, 2007.

The facility's existing Title V Permit does not list 40 CFR 63 Subpart RRR as an applicable requirement since that NESHAP was promulgated after the issuance of the facility's existing Title V permit. The requirements of the secondary aluminum MACT apply to affected sources that are major source of HAPs. Tifton Aluminum is a HAPs major facility. Tifton's permit application indicates that the facility is a major source of hydrogen fluoride (HF) and that Total HAPs emission from the facility has potential to exceed 25 tpy. The secondary aluminum MACT applies specifically to both reverberatory melt furnaces (F115 and F125) and to both inline fluxers (PIF1 and PIF2).

Reverberatory Melt Furnaces F115 and F125: The only difference from the initial Title V narrative pertains to the type of flux that can be used. In November 2004 EPD approved the use of fluoridated fluxes in the reverberatory furnaces and the in-line fluxers. Thus both chlorine and fluoridated fluxes can be used in the degassing operation. Both reverberatory furnaces are subject to emission limits for PM, HCl and Dioxin/Furan under the secondary aluminum MACT standards. The secondary MACT emission limits for the two furnaces (F115 and F125) are:

- i) 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge.
- ii) 15 µg of D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge.
- iii) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge.

Tifton may determine the emission standards for a secondary aluminum production unit (SAPU) by applying the furnace limits on the basis of the aluminum production weight in each furnace, rather than on the basis of feed/charge.

For the two furnaces and for the inline fluxers if the Permittee assumes that all flux added in the melting process is emitted in order to determine compliance with secondary aluminum MACT HCl emission limit, then a source test of the furnace or the in-line fluxer for HCl emissions at the exhaust stack is not required.

For in-line fluxers, demonstration of compliance with MACT HCl limit is considered to constitute compliance with the MACT PM limit as well. Therefore, if an in-line fluxer is in compliance with the HCl limit, it does not have to test for PM. The secondary aluminum MACT, Subpart RRR requires Tifton Aluminum to label each affected source.

Tifton Aluminum is required to monitor the amount of feed/charge to the affected sources or the aluminum production from the affected source. In addition, they must monitor and record, the type and amount of reactive flux added for each operating cycle or time period used in the performance test, develop and implement an operation, maintenance and monitoring (OM&M) plan for each affected source at the facility and to develop and implement a site-specific monitoring plan as part of the OM&M plan. The OM&M plan must also include a startup, shutdown and malfunction (SSM) plan. The site-specific monitoring plan must include a scrap inspection program for monitoring the contaminant (oil and coating content) level of furnace feed/charge materials. The secondary aluminum MACT has provisions for determining, monitoring and certifying the scrap contaminant level using a calculation method rather than a scrap inspection program. This MACT requires the Permittee to calculate and record a 3 day, 24-hour rolling average emissions of PM, HCl and D/F for each secondary aluminum production unit on a daily basis.

The Subpart RRR requires source tests for a representative furnace and a representative in-line fluxer for PM, HCl and D/F (for furnace only) at least once every five years. The secondary aluminum MACT requires submission of a report of all excess emissions, exceedances and excursions of the parameters that are monitored and all deviations from the permit limits.

Inline Fluxers PIF1 and PIF2: The inline fluxers were installed in 1998. They receive molten aluminum from the two reverberatory melt furnaces. The molten aluminum is refined in the electric inline fluxers by injection of various gases such as chlorine and fluoride fluxes before the molten aluminum is transferred to the direct chill casters. The processing rate of the fluxers is 20 tons/hour each. Each fluxer annually refines 19,500 tons of aluminum per year. The fluxers are subject to Georgia Rule 391-3-1-.02(2)(e) for PM emissions and Georgia Rule 391-3-1-.02(2) (b) for opacity and to the Secondary Aluminum MACT, 40 CFR 63, Subpart RRR. Rule (b) limits visible emissions from the fluxers and the melt furnaces to 40% opacity. The secondary aluminum MACT limits for the inline fluxers are:

0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge;

0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge.

Thus, for PM the emission limit for the two melt furnaces and the inline fluxers are determined by the lower of the two limits. The secondary aluminum PM MACT limit subsumes the Rule (e) limit since it is much lower than the Rule (e) limit.

The secondary aluminum MACT requires the Permittee to establish an operating parameter value or range for each and every parameter that needs monitoring under the MACT.

Tifton Aluminum can also demonstrate compliance with the MACT limits by showing that each furnace and inline fluxer complies individually with the emission limits for a new furnace or a new inline fluxer under the secondary aluminum MACT. Tifton Aluminum must inspect the labels for the furnaces and the in-line fluxers at least once a month to ensure that the labels are intact and legible.

Dye cleaning caustic baths D205, D206 and D207: The renewal Title V Permit Application shows a third dye cleaning caustic bath with a source code of D207 controlled by the same die cleaning scrubber, D829, as the other two caustic baths. The third caustic bath is subject to Rule (e) for PM emissions and to Rule (b) for opacity. This bath was installed in 2002. The material input and output to the third caustic bath is the same as that for the other two baths. There is no change in the requirement to perform monthly inspections of the scrubber that control emissions from the caustic baths. The Permittee is required to maintain records of the flow rate to the scrubber, pressure drop across the scrubbers and the pH of the scrubber outlet water, which are measured and recorded at least once per week, for compliance with the Georgia Toxics Guideline. Each scrubber must be inspected monthly. There are no changes in the equipment or rule applicability for the four sulfuric acid anodizing baths and the dye cleaning caustic baths.

D. Compliance Status

See Section VII.F

E. Operational Flexibility

See Section VII.A. In November 2004 the Permittee was authorized to use fluoridated fluxes in the degassing operations in the reverberatory melt furnaces. All rules, regulations, and/or emission rates specified above still apply when fluoridated fluxes are used in the degassing operation instead of the chlorine flux.

F. Permit Conditions

Condition 3.2.1 allows only natural gas and propane (LPG) to be used in the two melt furnaces and in the paint bake oven.

Condition 3.2.2 is added to the renewal permit and follows from the November 17, 2004, 502b(10) permit amendment and limits VOC emissions from the paint booths to 95 tpy. This is the SM permit limit for VOC and is a Georgia Rule 391-3-1.02(2)(ii) avoidance condition.

Condition 3.3.1 specifies the MACT emission limits for PM, HCl and D/F emissions for the two reverberatory melt furnaces.

Condition 3.3.2 lists equations for calculating the 3-day, 24-hour rolling average emissions of PM, HCl and D/F to be used in determining their compliance with the MACT limits for the two furnaces.

Condition 3.3.3 specifies the MACT limits for PM and HCl emissions for the two inline fluxers.

Condition 3.3.4 lists the requirements of 40 CFR 63.1506 governing the operation of two furnaces (F115 and F125) and two in-line fluxers (PIF1 and PIF2) subject to the secondary aluminum MACT.

Condition 3.3.5 requires that visible labels be posted, identifying the melt furnaces and the inline fluxers as per 40 CFR 63.1506(b).

Condition 3.3.6 is taken from 40 CFR 63.1506(d) and requires Tifton Aluminum to have the weight of feed/charge (or throughput) measured for each operating cycle or time period used in the performance test; and to operate each weight measurement system in accordance with the site specific OM&M plan. This condition also specifies the circumstances under which aluminum production weights may be measured instead of the charge weights.

Condition 3.3.7 states the requirements of 40 CFR 63.1506(n) for operation of the melt furnaces with no add-on air pollution control device. The total reactive flux injection rate must be less than the rate that was established during the initial or the most recent performance test. The furnaces also must be operated according to the work practice and pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.

Condition 3.3.8 specifies the corrective action to be taken when operations deviate from the conditions of the performance tests or deviates from established ranges in the OM&M plan as per 40 CFR 63.1506(p).

Condition 3.3.9 lists the emission limits for the coating operations subject to 40 CFR 63 Subpart MMMM.

Condition 3.3.10 requires the Permittee to comply with emission limits in the surface coating MACT (40 CFR 63 Subpart MMMM) using either the compliant material option in Condition 3.3.10a or the emission rate without add on control option in Condition 3.3.10b, as per 40 CFR 63.3891.

Condition 3.3.11 describes the predominant activity emission limit.

Condition 3.3.12 describes the facility-specific emission limit.

The conditions in Section 3.4 of the permit are described in the narrative for the facility's current Title V permit. Condition 3.4.2 and 3.4.3 in the facility's current Title V Permit are combined into Condition 3.4.2 in the renewed permit as the underlying regulation for all the sources listed in both conditions is the same.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division.

Additionally, a written notification of any performance test is required 30 days (60 days notification for tests required by the secondary aluminum MACT) prior to the date of the test and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

1. Individual Equipment

The renewal permit lists all testing requirements for emission units subject to the secondary aluminum MACT (Subpart RRR) and the surface coating MACT (Subpart MMMM). In 2002, Tifton performed the initial compliance testing of a reverberatory furnace for PM, HCl and D/F emissions in order to demonstrate compliance with the secondary aluminum MACT limits. Condition 4.2.1 requires the performance tests on one of the furnaces and one in-line fluxer to be repeated by July 27, 2007 and once every 5 years thereafter. Condition 4.2.1a requires Tifton to test one furnace for PM, HCl and D/F. Condition 4.2.1b requires Tifton to test one inline fluxer for PM and HCl emissions. If the permittee assumes that all reactive flux added to the group 1 furnace is emitted, then performance tests for HCl emissions from the melt furnace need not be conducted for the purpose of demonstrating compliance with the HCl emission limit in the secondary aluminum MACT. Likewise, if the same assumption for the reactive flux addition is made for the inline fluxer, then the HCl emission test need not be performed for the inline fluxer. For the inline fluxer, compliance with the HCl limit (secondary aluminum MACT limit) is considered to constitute compliance with the PM limit in the secondary aluminum MACT. Hence a separate test for PM emissions from the inline fluxer is not required whenever compliance with the HCl limit is established.

Condition 4.2.2 requires Tifton to follow the requirements and procedures in 40 CFR 63.7(c) in conducting the performance tests. This condition requires Tifton to establish a minimum or maximum operating parameter value or range for each parameter to be monitored to ensure compliance with the emission limits and standards of the secondary aluminum MACT. Condition 4.2.2a requires each source test to be conducted when the affected source is operating at the highest production level with charge materials representative of materials processed by the unit and at the highest reactive fluxing rates. Condition 4.2.2b states that each performance test must consist of at least three runs, at least one hour in duration. Condition 4.2.2c requires sampling for each run to be conducted over the entire process operating cycle.

Condition 4.2.2f states that if all criteria listed in 40 CFR 63.1511(f)(1) to (f)(5) are satisfied the emission rates from the tested unit may be considered representative of emission rates from other units of the same type at the same facility.

Condition 4.2.3 requires Tifton to establish a minimum or maximum operating parameter value or an operating parameter range for each parameter that is required to be monitored by the secondary aluminum MACT.

This condition also allows use of existing data in order to establish operating parameter values for compliance monitoring provided each condition of 40 CFR 63.1511(g) is satisfied.

Condition 4.2.4 requires Tifton to measure and record the total weight of feed/charge to the affected source or measure and record the weight of aluminum produced for each of the three test runs as required by 40 CFR 63.1512(k).

Condition 4.2.5 specifies the procedures to be used by Tifton to establish an operating parameter value or range for the total reactive chlorine flux injection rate as required by 40 CFR 63.1512(o).

Condition 4.2.6 and 4.2.7 specify the equations to be used for determining compliance with the emission limits for PM, HCl and D/F under the secondary aluminum MACT (40 CFR 63.1513(b)).

Condition 4.2.8 describes procedures to be used to convert D/F measurements to TEQ units.

Condition 4.2.9 outlines the equations and the alternative procedure for determining compliance with emission limits for secondary aluminum production unit (SAPU) as outlined in 40 CFR 63.1513(e). Tifton can also demonstrate compliance for a SAPU by demonstrating that each existing furnace and in-line fluxer is in compliance with the emission limits in the secondary aluminum MACT as specified in 40 CFR 63.1505(i) and (j).

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously, except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

Monitoring requirements specified in Permit No. 3354-277-0012-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In addition to the monitoring requirements specified in the facility's current Title V Permit, the renewal permit requires the Permittee to measure the pressure drop across scrubbers, scrubber flow rates and scrubber outlet water pH for representative operations.

The Permittee is also required to submit a report to EPD containing the readings that have been established for the scrubber for normal operation and describe the procedures used to establish the pressure drop range, scrubbant flow rate range and the scrubber outlet water pH range. These requirements are State only enforceable requirements and are not required by the secondary aluminum MACT.

Condition 5.2.1 to 5.2.4 are State only enforceable conditions required by the Georgia Air Toxics Guideline. Condition 5.2.1 requires Tifton Aluminum to monitor the pressure drop across the scrubbers, scrubbant flow rate and the outlet PH for the water leaving the scrubbers. Condition 5.2.2 requires monthly inspection of each scrubber to ensure optimum performance. Condition 5.2.3 requires Tifton Aluminum to establish values or ranges of pressure drop and scrubbant flow rate for representative operations and submit a report to EPD of the pressure drop and scrubbant flow rate ranges that represent normal operations.

The Permittee is required to inspect the labels for each furnace and inline fluxer at least once per calendar month (Condition 5.2.5). The Permittee is required to monitor the total weight of feed/charge to the melt furnace, or the aluminum production from the source or emission units over the same operating cycle or time period used in the performance test (Condition 5.2.6).

Condition 5.2.7 requires Tifton to continuously measure and record the weight of gaseous or liquid reactive flux injected into each furnace and inline fluxer.

Section 5.3 of the renewal permit has all record keeping and reporting requirements for the secondary aluminum MACT. Condition 5.3.1 requires Tifton to develop and implement an operation, maintenance and monitoring (OM&M) plan that satisfies all requirements of 40 CFR 63.1510(b) and that is consistent with the requirements of the secondary aluminum MACT.

Condition 5.3.2 requires Tifton to develop a written site-specific monitoring plan for submittal to the Division as part of the OM&M plan consistent with the requirements of 40 CFR 63.1510(o).

The Permittee is required to have a scrap inspection program for monitoring the contaminant level in the scrap (Condition 5.3.3) as specified in 40 CFR 63.1510(p).

Condition 5.3.4 outlines an alternative to the scrap inspection program by using a calculation method as outlined in 40 CFR 63.1510(q).

Condition 5.3.5 specifies site-specific requirements for secondary aluminum production units (SAPU) as required by 40 CFR 63.1510(s). Condition 5.3.5a. lists information that must be included in an OM&M plan as specified in 40 CFR 63.1510(b). Condition 5.3.5c specifies procedures to be followed by Tifton for revising the SAPU compliance provisions.

Condition 5.3.6 lists the procedures for calculating and recording the 3-day, 24-hour rolling average emissions of PM, HCl and D/F for each SAPU on a daily basis as per 40 CFR 63.1510(t).

Condition 5.3.7 states as an alternative to procedures in Condition 5.3.6, Tifton can demonstrate through performance tests that each individual emission unit within the SAPU is in compliance with the applicable emission limit for the emission unit as per 40 CFR 63.1510(u).

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable to sources at this facility. The two reverberatory melt furnaces and the inline fluxers have no pollution control equipment for regulated pollutants. Also, the secondary aluminum MACT is exempt from CAM requirements (post 11/15/1990 limits). Similarly the paint booths in the coating operations do not have any pollution control equipment and are exempt from CAM. Moreover, the surface coating MACT is a post 11/15/1990 standard.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis. Condition 6.1.4 requires semi-annual reporting of excess emissions, exceedances, excursions and deviations. The semi-annual reports must be submitted within 30 days after the end of the reporting period even though the secondary aluminum MACT requires submission of reports within 60 days after the end of the reporting period. The reports must be submitted within 30 days in order to be consistent with submission of all other reports that are required.

B. Specific Record Keeping and Reporting Requirements

The record keeping requirements specified in Permit No. 3354-277-0012-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

The 502b(10) permit amendment of November 2004 includes conditions required for calculating VOC emissions from the paint booth (source code P430) each month in order to demonstrate compliance with its VOC emission limit (Condition 3.2.2).

Tifton Aluminum must notify EPD whenever the monthly VOC emissions from the paint booth exceed 7.9 tons or the twelve consecutive month VOC emissions exceed 95 tons. The renewal permit also has conditions for all notification, reports and records required by the secondary aluminum MACT and the surface coating MACT.

Conditions 5.3.1, 5.3.2 and 5.3.3 in the facility's current permit are moved to Section 6 of the renewal permit and are now conditions 6.1.2, 6.1.5 and 6.1.1 respectively. Tifton Aluminum must maintain records of the monthly chlorine and fluoride flux usage in the melting furnaces.

Condition 6.2.4 requires Tifton to notify EPD by the 15th day after the end of a month, if the monthly paint booth VOC emissions exceed 7.9 tons.

Condition 6.2.5 requires Tifton to notify EPD by the 15th day after the end of a month, if the rolling total VOC emissions from the paint booths for the last twelve consecutive months exceed 95 tons.

Condition 6.2.7 requires the Permittee to submit a notification of compliance status to EPD and EPA within 30 days following the end of the initial compliance period for the coating MACT (40 CFR 63 Subpart M).

Condition 6.2.8 specifies the reports that need to be submitted under the startup, shutdown and malfunction (SSM) plan. Tifton is required to report any action taken during SS&M that is not consistent with the procedures in the SS&M plan.

Condition 6.2.9 requires reporting of all deviations from the requirements of the secondary aluminum MACT and the coating MACT in the semi-annual report. Condition 6.2.9 b. requires submission of the results of any performance test conducted during the semi-annual reporting period.

Condition 6.2.10 requires Tifton to include the periods of excess emissions that were reported as required by the secondary aluminum MACT and a statement that all monitoring, recordkeeping and reporting requirements of the secondary aluminum MACT were met, in the annual compliance certification.

Condition 6.2.11 requires Tifton to submit a semi-annual compliance report as specified in the coating MACT (40 CFR 63 Subpart M).

Condition 6.2.12 and 6.2.13 address record keeping requirements under the secondary aluminum MACT.

Condition 6.2.14 addresses record keeping requirements under the coating MACT (40 CFR 63 Subpart M).

Condition 6.2.15 requires Tifton to maintain records regarding the compliance option used and the time period for use of a particular compliance option under the coating MACT.

Condition 6.2.16 specifies the record keeping for the compliant material option as required by the coating MACT.

Condition 6.2.17 lists the record keeping for the emission rate without add-on control option as required by the coating MACT.

Conditions 6.2.18 through 6.2.22 are recordkeeping requirements under the coating MACT. Condition 6.2.18 states that Tifton Aluminum may use the purchase records in lieu of recording volumes of each coating, thinner or other additives and cleaning materials when using the compliant material option. Condition 6.2.19 requires Tifton Aluminum to maintain record of the mass fraction of organic HAP for each coating, thinner or additive and cleaning material unless the coating is a powder coating or is tracked by weight. Condition 6.2.20 requires maintenance of the records of volume fraction of coating solids for each coating

When using the emission rate without add-on control option, Tifton shall maintain the density of each coating, thinner and or additives or cleaning materials used (Condition 6.2.21). Condition 6.2.22 requires Tifton Aluminum to keep records of the name and address of the treatment, storage and disposal facility (TSDf) when using the emission rate without add-on control option and the allowance for organic HAP contained in the waste.

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.1 is the standard operational flexibility condition in all Title V Permits.

B. Alternative Requirements

No alternative requirements were requested by the facility and the current permit and the renewal permit has no alternative requirements.

C. Insignificant Activities

This insignificant activities is attached at the end of the Title V Permit. The activities in the permit are consistent with those found in the following sections in the facility's renewal permit application.

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

The facility does not currently have any temporary sources and does not anticipate use of such sources in the future.

E. Short-Term Activities

No short term activities were reported in the facility's renewal permit application in form D.5.

F. Compliance Schedule/Progress Reports

The facility appears to be in compliance with all applicable state and federal air quality regulations. Therefore, no compliance schedule or progress report is necessary. The compliance date for the surface coating MACT is January 2, 2007.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

The facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Stratospheric Ozone Protection Requirements

No stratospheric ozone protection requirements (see subsection J.) apply to the source. Since Tifton Aluminum has some air conditioners, chillers and refrigerators, Subpart F is an applicable requirement.

J. Pollution Prevention

The Title V permit has no pollution prevention requirements.

K. Specific Conditions

The Title V permit has no facility-specific conditions, not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The public notice for Tifton Aluminum's draft Title V Renewal Permit appeared in the September 8, 2005 issue of the *"Tifton Gazette."* The comment period expired on October 11, 2005. Official comments were received from Tifton Aluminum on September 30, 2005. Tifton Aluminum also submitted comments on the draft permit prior to the public notice on August 19, 2005. A meeting was held between EPD staff and Tifton Aluminum personnel on October 4, 2005 to discuss Tifton's draft permit comments. EPD determined that Tifton's comments would be addressed in the permit review process. Tifton's comments and EPD response to the comments are as follows:

Comments on Part 1, Facility Description

Comment: Condition 1.3

An editorial correction of the text appearing in the "Overall Facility Process Description" is required to more accurately characterize the nature of flux materials used at the facility.

The word "*degassing*" should be deleted from the third sentence of the paragraph.

Response: EPD has decided to replace the word "*degassing*" with the word "reactive" at the beginning of the third sentence in the third line of Section 1.3 the overall process description since the added reactive flux performs several functions including degassing of the molten aluminum.

Comments on Part 3, Requirements for Emission Units

Comment: Condition 3.4.2

The condition establishing the allowable particulate matter standard as presented in the permit is not consistent with the underlying regulation [i.e. 391-3-1-.02(2)(e)1(i)]. The cited regulation is for "New" emission units, however it is not clear from the permit whether the identified emission units are or are not "New." If they are not "new" then the applicable requirement should be 391-3-1-.02(2)(e)1(ii).

The permit condition also changes the basis of the production rate value used in the calculation. This unauthorized change affects the resulting allowable emission limit by potentially rendering a lesser allowable emission rate. The underlying regulation does not require that the production rate be considered on a "dry basis." Revision of the condition is required to be consistent with the applicable requirement.

An example of how this affects the allowable emission rate follows: At a 30,000 lb/hr input rate with a 5% moisture content, the "dry" basis difference in allowable emissions is 1.3lb/hr, or 5.6 tons/year.

Response : None of the affected sources at the facility are existing sources since they have all been constructed or installed after July 2, 1968. Hence Rule (e)1.(i) is the applicable requirement for PM emissions from the affected sources. P is defined as the process input weight rate in tons per hour in Rule (e)1.(i). The definition of process input weight in 391-3-1-.01(ggg)3 states that " Moisture shall not be considered as part of the process weight" and that the "interpretation that results in the minimum value for allowable emission shall apply. The exclusion of free moisture from the process input weight results in minimum value of allowable emissions. Hence, Condition 3.4.2 is not being changed.

Comments on Part 4, Requirements for Testing

Comment: Condition 4.2.2

Condition 4.2.2 correctly identifies the ongoing performance testing requirement as 40 CFR 63.7(c), but fails to identify the applicable requirements of paragraphs (a) through (f) as “initial performance test” requirements. The proper identification of the applicable requirements is required by 40 CFR 70.6(a)(1), and certification of compliance with the initial performance test requirements should be a one-time certification. Revisions are required to make clear that certification of compliance with initial performance test requirements need only be done one time.

Response: Condition 4.2.2 has been reworded to clarify, that it addresses initial performance test requirements as specified in 40 CFR 63.1511(b). It consists of the requirements of 4.2.2 a. through 4.2.2.e. of the draft permit. A new Condition 4.2.3 is added to address the requirements of repeat tests as specified in 40 CFR 63.1511(e). Condition 4.2.2 f in the draft permit is renumbered as Condition 4.2.4 in the final permit to address testing of representative emission units as specified in 40 CFR 63.1511(f).

Comment: Condition 4.2.5

Condition 4.2.5 requires the Permittee to derive an appropriate proportion factor for solid reactive flux other than magnesium chloride, and that use of the proportion factor is contingent upon approval by EPD. The wording of this condition is inconsistent with GA-EPD approvals authorizing the use of alternative fluxes at this facility. The permit does not affirm that Tifton Aluminum has already been authorized to use a reactive flux that is not magnesium chloride and does not rely upon the compliance demonstration methodology previously approved by GA-EPD. The permit condition should be restated to include a statement affirming EPD’s-EPD’s prior approval to use alternative fluxing materials and should incorporate the compliance demonstration calculation methodology that has been approved for use with chloride and non-chloride containing reactive fluxes.

Response: Condition 4.2.5 (e) is amended allowing the use of proportion factors approved by EPD for solid reactive fluxes other than magnesium chloride or requiring the permittee to derive the proportion factor subject to approval by the Division. This makes Condition 4.2.5(e) more flexible and gives the Permittee the option to use the proportion factor approved by EPD for a non-magnesium chloride flux. Condition 4.2.5 in the draft permit is renumbered as Condition 4.2.7 in the final permit.

Comment: Condition 4.2.9(d)

Condition 4.2.9(d) references requirements to comply with “new” source emission limits. The emission units at this facility are not “new” emission units for the purpose of Subpart RRR. The references to “new” should be corrected to reference requirements for “existing” sources subject to the MACT.

Response: Condition 4.2.9(d) is an alternative compliance demonstration method. In lieu of using the equations in Conditions 4.2.9(a), (b) and (c) for each existing furnace and in-line fluxer, compliance may be demonstrated by showing that existing units meet new unit emission limits. In Condition 4.2.9(d) the term “existing furnace” is replaced with “existing group 1 furnace” to make it identical with 40 CFR 63.1513(e)4. Condition 4.2.9 in the draft permit is renumbered as Condition 4.2.11 in the final permit.

Comments on Part 5, Requirements for Monitoring (Related to Data Collection)**Comment:** Condition 5.1.1

Condition 5.1.1 cites Rule 391-3-1-.02(6)(b)1 as the underlying applicable requirement for continuous monitoring requirements. The Georgia “RULES FOR AIR QUALITY CONTROL,” is silent at 391-3-1-.02(6)(b)1 with respect to continuous monitoring and does not affirmatively impose any requirement upon persons engaged in operations which cause emissions to be released into the atmosphere. Rather, the regulatory citation establishes the possibility of future applicable monitoring requirements and grants discretionary authority to the Director to require **reasonable** [emphasis added] monitoring, reporting, and recordkeeping.

The requirement in Condition 5.1.1 to operate and record the results from continuous monitoring equipment at all times, including periods of monitoring system response, calibration checks, and zero and span adjustments is not “reasonable.” Data obtained during these periods are not indicative of true emissions; and if they are not excluded from the emission data set, the data from these periods have the probability of biasing the compliance determinations. The requirement imposed via this permit condition should be consistent with Section 1.4, paragraph (e) of GA-EPD’s Testing and Monitoring Procedures document.¹ GA-EPD’s monitoring procedure recognizes that monitoring systems breakdown, need repairs, require calibration checks, and that proper operation involves time for zero and span adjustments. The procedure requires continuous monitoring systems to be in continuous operation and to meet minimum frequency of operation requirements, **except for times of systems breakdowns, repairs, calibration checks, and periods when zero and span adjustments occur** [emphasis added]. The permit condition requires revision.

Response: Condition 5.1.1 is a standard condition in each and every Title V Permit issued by EPD. This condition requires recording of data during all periods of operation of the affected facility except during periods of monitoring system breakdown and repairs. This condition also requires measurement and recording of monitoring system response relating to calibration checks and zero and span adjustments during periods of normal operation of the affected facility. The monitoring reports required by EPD clearly require identification of periods of monitor downtime resulting from monitor system breakdown and repairs and also periods of monitoring system calibration and zero and span adjustments/checks. EPD requires the permittee to retain records of monitoring system calibrations, zero and span adjustments to clearly identify when these occur in the monitoring system report. No change is made to this condition.

Comment: Condition 5.3.1

The requirement presented in Condition 5.3.1 is different from the underlying applicable requirement and imposes requirements beyond recordkeeping. The condition needs to be rewritten to address the proper recordkeeping requirements, or re-title section 5.3 to require the development and submission of an OM & M plan.

Response: Condition 5.3.1 details the Operation, Maintenance & Monitoring (OM&M) plan required by the secondary Aluminum MACT (40 CFR 63, Subpart RRR) at 40 CFR 63.1510(b). Section 5.3 addresses recordkeeping and reporting requirements associated with specific monitoring requirements.

¹ Procedures for Testing and Monitoring Sources of Air Pollutants , Part I. Section 1.4. Monitoring. Rev. (4), 2/01;
<http://www.air.dnr.state.ga.us/airpermit/>

The OM&M Plan is a specific monitoring plan under the secondary aluminum MACT. This condition is moved to Section 5.2 (specific monitoring requirements) in the final permit and is renumbered as Condition 5.2.8.

Comment: Condition 5.3.3

The location has an approved alternative monitoring method in their site-specific monitoring plan. The condition should be rewritten to reflect the approved monitoring plan alternatives.

Response: The wording of Condition 5.3.3 is changed to allow the submittal of a scrap inspection program for approval by EPD. Conditions 5.3.3 a. through f. in the draft permit is deleted to accommodate guidance from EPA regarding the content of the scrap monitoring plan. Condition 5.3.3 in the draft permit is renumbered as Condition 5.3.2 in the final permit. The Scarp Monitoring program must be submitted for EPD review and approval within 120 days of the issue of the permit.

Comments on Part 6, Recordkeeping and Reporting Requirements

Comment: Condition 6.1.1

Condition 6.1.1 requires record retention based upon when information was “entered” into archiving medium, (e.g. database, operator’s log, SSM Log, etc.). The underlying requirement is for records to be maintained for 5-years from the date on which the record is created, not entered into the historical record. The date of record entry may be different from the date of creation. Revise the permit language to require records to be maintained for 5-years from the date on which the record is created.

Response: EPD agrees that the intent of the language in Condition 6.1.1 is for records to be retained for five years from the date of creation. The word “entry” at the end of Condition 6.1.1 is changed to “creation” in order to be consistent with the underlying regulations.

Comment: Condition 6.1.2, Condition 6.1.3, and Condition 6.1.4

The reporting requirement and the actions required by Condition 6.1.3 appear to be redundant. The regulatory authority which is cited as the underlying authority, 40 CFR 70.6(a)(3)(iii)(B), speaks to “prompt reporting of deviations from permit requirements.” The federal requirement of 40 CFR 70.6(a)(3)(iii)(B) is satisfied via Condition 6.1.2.

What appears is a GA-EPD attempt to fold multiple MACT semi-annual reporting requirements into the Section 6 Recordkeeping and Reporting requirements, without specifically identifying the Part 63 requirements. The requirements that should be included may be found at 40 CFR Part 63.1516(b) and 40 CFR Part 63.3920(a)(1)(i)].

Response: Condition 6.1.2, 6.1.3 and 6.1.4 are standard conditions in each and every Title V Permit issued by EPD. These conditions are mandated by Part 70 and have been approved by EPA. The requirements under 40 CFR Part 63.1516(b) and 40 CFR Part 63.3920(a)(1)(i) are identified and addressed by Conditions in Section 6.2 of the permit. Condition 6.1.2 requires prompt reporting of all excessive emissions. Condition 6.1.4 requires reporting of excess emissions, exceedance and excursions identified in Condition 6.1.7. As a catchall, Condition 6.1.3 requires reporting of all violations not addressed by Condition 6.1.2 and 6.1.4. Condition 6.1.3 is updated to exclude reports required by Condition 6.2.10 from the catchall reporting.

Comment: Condition 6.1.4

The timing for reporting is not consistent with other reporting requirements in the permit. The submittal dates for reports should be harmonized throughout the permit and should be consistent with the underlying regulations granting authority to the agency to require the specific reports.

Response: Semi-annual reports are required to be submitted within 30 days of the end of the reporting period, which is a reasonable time period consistently used by EPD for semi-annual report submittals in Georgia. It is at least as restrictive as 40 CFR 63.1516(b). Hence, no change is made to Condition 6.1.4.

Comment: Condition 6.1.5 and Condition 6.1.6

The cited regulatory authority fails to include references to recordkeeping requirements of 40 CFR Part 63, Subpart RRR [i.e. 40 CFR Part 63.1517(a) and 40 CFR Part 63.10(b)]

Response: Record keeping requirements of 40 CFR Part 63 are in Section 6.2. Conditions 6.1.5 and 6.1.6 are generic record keeping requirements contained in all Title V permits. Specific record keeping requirements are listed in Section 6.2 of the permit. In particular, Condition 6.2.11 (final permit) addresses requirements of 40 CFR 63.1517(a), which includes the requirements of 40 CFR Part 63.10(b). No change is made to Conditions 6.1.5 or 6.1.6.

Comment: Condition 6.1.7

Condition 6.1.7 fails to clearly define what constitutes excess emissions, exceedances, and/or excursions. The lack of clarity renders it impossible for the permittee to identify the events to be reported pursuant to Condition 6.1.4. The definitions require clarification to be usable. As presented, the definition relied upon an unidentified definition(s) outside of the defining text to distinguish what constitutes an excess emission.

ORIGINAL TEXT: Excess emissions: (means for the purpose of this condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

SUGGESTED Clarification of Definition: Excess emissions: For the purpose of this condition and Condition 6.1.4, "*Excess emissions*" means **any actual release** of air pollution into the ambient air that is determined by monitoring or record keeping to be in quantities or rates **greater than an applicable emission limit** in this permit.

Response: The current language defining excess emissions is adequate and clearly describes excess emissions as any condition that is detected by monitoring or record keeping, which is specifically defined, or stated to be, excess emissions by an applicable requirement. The draft permit states that there are no excess emissions to be reported in accordance with Condition 6.1.4. No change is made to the definition of excess emissions. However, 40 CFR 63.1516(b) does require reporting of excess emissions as defined in the MACT, which is addressed by Condition 6.2.8 (final permit).

Comment: Condition 6.2.3

If the coatings require mixing prior to application, the calculation for determining monthly VOC emissions does not include all components of the coating. As written, the calculation does not include any diluents added to the coating in the paint kitchen or added during a coating run to maintain the requisite coating properties necessary for proper surface coating.

A revised calculation should replace the calculation appearing in the permit. The following calculation would ensure that VOC would be properly determined:

$$\text{VOC}_{\text{Coating}} = \Sigma [(G_x * V_x + G_y * V_y + G_z * V_z)] - (W_x * O_x + G_y * O_y + G_z * O_z) / 2000 \text{ lb/ton}$$

Where “x” = paint, “y” = paint kitchen diluents, and “z” = diluents additions after initial mixing

Response: The term paint is being replaced with VOC containing material. This rewording more generically addresses all possible scenarios.

Comment: Conditions 6.2.4, 6.2.5, and 6.2.6

Reference to 391-3-1-.02(2)(ii) should be stricken from the permit because is not applicable. Pursuant to 391-3-1-.02(2)(a)(6)(i)(I), 391-3-1-.02(2)(ii) is not applicable, regardless of the reason, because the potential VOC emissions from this facility are less than the applicability threshold of 100 tons VOC/yr.

Response: Conditions 3.2.3, 6.2.2, 6.2.3,, 6.2.4 or 6.2.5 are intended to assure avoidance of 391-3-1-.02(2)(ii). Condition 6.2.6 of the draft permit is deleted from the final permit because 391-3-1-.02(2)(ii) is not applicable, so a solids equivalent limit does not apply.

Comment: Condition 6.2.7

The permit does not identify all of the notifications required by 40 CFR 63, Subpart M, and fails to identify the notification requirements associated with SMOA as being applicable requirements. The different notifications required by 40 CFR 63.3910(a) through (c) and 40 CFR 63.1515(a) and (b) should be shown in this condition, and these regulatory citations should also be included as the regulatory authority for the permit condition.

Response: The initial notification required by 40 CFR 63.3910(b), has been submitted in a timely manner. The NOCS (notification of compliance status) required by 40 CFR 63.3910(c) is addressed by condition 6.2.6 (final permit). The requirements of 40 CFR 63.3910(a) are addressed in Condition 4.1.2 and the citation for this condition has been updated to include 40 CFR 63.3910(a). Initial notification required by 40 CFR 63.1515(a) is not required for an existing affected source. The notification of compliance status required by 40 CFR 63.1515(b) has been submitted as required by May 24, 2003. Hence, Condition 6.2.6 (Draft Condition 6.2.7) is not changed.

Comment: Condition 6.2.9

The regulation cited as the basis for this requirement establishes that reports are to be submitted within 60-days after the end of the reporting period, not 30-days as is shown in the text of the permit. The text of the permit should be changed to be consistent with the underlying regulatory requirement.

Response: 40 CFR 63.1516(b) requires excess emission/summary report to be submitted within 60-days after the end of the reporting period. Condition 6.2.8 in the final permit (Condition 6.2.9 in draft permit) requires submission of this report within 30 days after the end of the reporting period. 30 days is a reasonable time period consistently used by EPD for excess emission report submittals in Georgia.

Comment: Condition 6.2.11

The timing for semi-annual reporting pursuant to 40 CFR 63, Subpart M MMM should be harmonized with the semi-annual reporting requirements of Subpart RRR. The Subpart M MMM regulation authorizes alternative submission dates through the Title V operating permit. [40 CFR 63.3920(a)(1)(iv)]

Response: 40 CFR 63.3920(a)(1)(iii) requires submission of semi-annual compliance reports within 30 days of the end of the reporting period. The timing for semi-annual reporting is kept at 30 days from the end of the reporting period. This is consistent reporting timeframe EPD applies to other facilities in Georgia. This condition is renumbered as Condition 6.2.10 in the final permit.

Comment: Condition 6.2.13(f)(iii)

The text of the permit condition omits the parenthetical phrase, “if applicable”, at the end of the requirement. This omission changes the requirement from an optional requirement to a mandatory requirement and affects the location’s compliance options. The wording of the federal regulation should be added to the text of the permit condition.

Response: The requested phrase “if applicable” is added to the end of Condition 6.2.13(f)(iii). Draft Condition 6.2.13 is renumbered as Condition 6.2.12 in the final permit.

Comment: Condition 6.2.13(g)

The requirement to maintain the records per Condition 6.2.13(g) is inconsistent with the compliance demonstration requirements of 40 CFR §63.1510(u). The facility has elected to demonstrate compliance using an alternative to the procedures of paragraph §63.1510(t) by demonstrating, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit. The records of total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average are not required.

Other sites within the permit where reference to requirements for 3-day, 24-hour rolling average determinations should be corrected as well. References to requirements for 3-day, 24-hour rolling average determinations were found during our review at Conditions 3.3.2(a), 3.3.2(b), 3.3.2(c), 4.2.1, 5.3.5(a)(v), 5.3.6, 5.3.6(e), 6.2.9(a)(iv), and 6.2.13(g).

Response: EPD agrees with Tifton’s comment and adds the term “Except as provided for in Condition 5.3.6 (condition 5.3.7 in draft permit)” to Conditions 3.3.2(a), 3.3.2(b), 3.3.2(c), 4.2.1, 5.3.5, 6.2.8(a)(iv) (6.2.9(a)(iv) in draft permit), and 6.2.13(g) in order to reflect the fact Tifton can demonstrate compliance by using procedures of 40 CFR §63.1510(u) that does not require records of total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions. Condition 6.2.13 is renumbered as Condition 6.2.12 in the final permit.

Comment: Condition 6.2.19

The last part of the permit condition changes the underlying applicable requirement by requiring a record of the mass fraction of organic HAP for each material used, unless the material is a powder coating. The federal regulation requires that the mass fraction of organic HAP be determined regardless of the physical state of the coating material, unless the materials are tracked by weight. The permit wording should be changed to convey the same meaning as the underlying federal requirement.

Response: During the revisions between Proposal and Promulgation, EPA added the alternative to track coating usage by weight in lieu of volume to accommodate powder coatings (See discussion at 69 FR150, center column, first comment). EPD has dropped the term “or the material is tracked by weight” in order to be consistent with 40 CFR 63.3930(e). Condition 6.2.19 is renumbered as Condition 6.2.18 in the final permit.

Comment: Condition 6.2.21

The wording of the second sentence of the permit condition inadvertently circumvents the recordkeeping requirements of Subpart Mmmm by stating that the records of coating density is not required, “if the permittee purchases materials or monitors consumption by weight instead of volume.” Since all materials are purchased (i.e. not manufactured on-site), the condition exempts the location from the requirement to document coating densities, even if material consumption is monitored by volume. The phrase “the permittee purchases materials or” should be deleted from the permit condition.

Response: The language in this condition is taken directly from the MACT. The MACT is allowing purchase records and consumption record to be equal in hierarchy for usage in compliance calculations. It also allows the facility to not conduct density testing of powder coatings (§63.3951(c)). The term “maintain the density of each coating” is replaced with “maintain records of the density of each coating” in the first sentence of this condition. In order to be consistent with 40 CFR 63.3951(c) the phrase “the permittee purchases materials or” is changed to “the permittee purchases materials by weight instead of volume and” permit condition as requested by Tifton. Additional language is added clarifying that applied coating solids density (ASTM D5965-02) shall be maintained for powder coatings if the volume of powder coatings is used in the compliance determination. Condition 6.2.21 is renumbered as Condition 6.2.20 in the final permit.

Comments on Part 7, Other Specific Requirements

Comment: Condition 7.2.1

The fifth requirement in the 391-3-1-.03(10)(b)(6) was omitted from the permit condition. Since it is one of the requisite requirements that must be met in order for an off-permit change to be made, it needs to appear in the Condition 7.2.1 list.

Response: The fifth requirement in the 391-3-1-.03(10)(b)(6) is “ The source shall obtain any permits required under Rules 391-31-.03(1) and (2).” The fifth requirement is added to Condition 7.2.1.

Comment: Condition 7.2.2

The wording of the second condition needs to be edited to remove references to Title IV, because the location is not subject to provisions of the Acid Deposition Control Program. Note condition 7.9 for confirmation.

Response: Condition 7.2.2. is present in all Title V Permits issued by EPD. While the facility is currently not subject to Title IV, this condition requires a permitting action if the company makes a change such that the facility becomes subject to it after the change. Condition 7.2.2 is not changed.

Comment: Condition 7.11

The facility is subject to the requirements of 40 CFR Part 82. Because the location has systems that contain regulated substances, the language of the permit condition 7.11.1 should be re-written to reflect the affirmative applicability of the requirements.

Response: Condition 7.11.1 has been approved by EPA and is present in all Title V Permits issued by EPD. Systems containing regulated substance could change during the life of the permit making 40 CFR Part 82 inapplicable to the facility in which case the permit would have to be reopened and amended if Condition 7.11.1 has the suggested language. For the sake of permitting efficiency, Condition 7.11.1 is not changed.

Comment: Condition 8.3 and 8.14.1

The permit should specifically identify the permit terms for which annual compliance certification is not required, such as those that do not impose any requirements. For example, those permit terms that declare rights, processes, or authorities, but do not impose a requirement on the permittee, such as Conditions 8.1.1, 8.1.2, 8.2, 8.3.2 etc., should be specified as not needing any compliance certification.

Response: Conditions in Section 7 and 8 of the Title V permit are generic conditions in all Title V Permits issued by EPD and are not being changed in response to Tifton's comment. Tifton can respond as not applicable in their compliance certifications to any condition that is not applicable to the facility during the compliance period.

Comment: Condition 8.14.2

The permit should specifically identify other applicable standards or delete the specific references to SMOCT reports. Make the reporting universally applicable.

Response: Draft Permit Condition 8.14.2 is deleted since it is a repeat of draft permit Condition 6.2.10. Draft Permit Condition 6.2.10 is Condition 6.2.9 in the final permit. Section 8.14 is renumbered in the final permit.

Comment: Condition 8.26.1

The condition titled "Use of Any Credible Evidence or Information" was found to have no regulatory basis. A computer search of the entire GEORGIA DEPARTMENT OF NATURAL RESOURCES, ENVIRONMENTAL PROTECTION DIVISION, AIR PROTECTION BRANCH regulations yielded no citations containing the word "credible" or the word combination "credible evidence."

The regulatory citation given in Condition 8.26.1 as the authority relates to emission sampling and alternatives that may be approved by the Director. Either this section needs to be removed from the permit, or the correct regulatory test inserted.

Response: Condition 8.26.1 is a condition required by EPA to be included in all Title V permits issued by EPD. The citation for this condition, 391-3-1-.02(3)(a), is the correct citation. Georgia's credible evidence provisions are contained in the procedures for testing and monitoring manual (PTM). Georgia Rule 391-3-1-.02(3)(a) incorporates the PTM by reference. Condition 8.26.1 or its citation is not changed in response to Tifton's comment. EPD provided the Permittee with all documentation to substantiate the regulatory authority underlying this permit condition and the citation for this permit condition. Upon review of the information, Tifton withdrew its comments on Condition 8.26.1.

Changed Permit Conditions

The following are the changed permit conditions in response to comments from Tifton Aluminum.

3.3 Equipment Federal Rule Standards

3.3.2 The Permittee must comply with the emission limits calculated using the equations for PM, HCl and D/F listed in this condition for each SAPU:
[40 CFR 63.1505(k)]

- a. Except as provided for in Condition 5.3.7, the Permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of:

$$L_{C_{PM}} = \frac{\sum_{i=1}^n (L_{ti_{PM}} * T_{ti})}{\sum_{i=1}^n T_{ti}}$$

Where,

$L_{ti_{PM}}$ = The PM emission limit for individual emission unit i (furnaces F115 or F125)

T_{ti} = The feed/charge rate for individual emission unit i; and

$L_{C_{PM}}$ = The PM emissions limit for the secondary aluminum production unit.

- b. Except as provided for in Condition 5.3.7, the Permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of HCl in excess of:

$$L_{C_{HCl}} = \frac{\sum_{i=1}^n (L_{ti_{HCl}} * T_{ti})}{\sum_{i=1}^n T_{ti}}$$

Where,

$L_{ti_{HCl}}$ = The HCl emission limit for individual emission unit i for furnace (F115 or F125);

$L_{C_{HCl}}$ = The HCl emission limit for the secondary aluminum production unit.

- c. Except as provided for in Condition 5.3.7, the Permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of:

$$L_{C_{D/F}} = \frac{\sum_{i=1}^n \left(L_{ti_{D/F}} * T_{ti} \right)}{\sum_{i=1}^n T_{ti}}$$

Where,

$L_{ti_{D/F}}$ = The D/F emission limit for individual emission unit i for furnace (F115 or F125); and

$L_{C_{D/F}}$ = The D/F emission limit for the secondary aluminum production unit.

- d. The Permittee may demonstrate compliance with the emission limits in this condition by demonstrating that each emission unit within the SAPU is in compliance with the applicable emission limits in Condition No. 3.3.1.

4.2 Specific Testing Requirements

Performance Test/Compliance Demonstration General Requirements

- 4.2.2 The Permittee must conduct the initial performance test in accordance with the requirements and procedures set forth in 40 CFR 63.7(c).
[40 CFR 63.1511(b)]
- a. The Permittee must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
 - b. Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.
 - c. Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.
 - d. Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.

- e. Compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.
- 4.2.3 The Permittee must conduct a performance test every five years following the initial performance test in accordance with the requirements and procedures set forth in 40 CFR 63.7(c).
[40 CFR 63.1511(b)]
- 4.2.4 With prior approval of the Division the Permittee may utilize emission rates obtained by testing a particular type of furnace which is not controlled by any add-on pollution control device, or by testing an in-line fluxer which is not controlled by any add-on pollution control device, to determine emission rates for other units of the same type at the same facility. Such emission results may only be considered representative of other units if all of the criteria in 40 CFR 63.1511(f)(1) to (f)(5) are satisfied.
[40 CFR 63.1511(f)]

Equations For Determining Compliance

- 4.2.8 The Permittee shall use the following equation to determine compliance with an emission limit for PM, or HCl:
[40 CFR 63.1513(b)(1)]

$$E = \frac{C * Q * K_1}{P}$$

Where,

E = Emission rate of PM, HCl, or D/F kg/Mg (lb/ton) of feed;

C = Concentration of PM, HCl, or D/F g/dscm (gr/dscf);

Q = Volumetric flow rate or exhaust gases, dscm/hr (dscf/hr);

K_1 = Conversion factor, 1 kg/1000 g (1 lb/7000 gr); and

P = Production rate, Mg/hr (ton/hr).

- 4.2.11 The Permittee shall use the equations or alternative procedure outlined in this condition to determine compliance with emission limits for a secondary aluminum production unit:
[40 CFR 63.1513(e)]
- a. Use the following equation to compute the mass-weighted PM emissions for a secondary aluminum production unit.

$$E_{C_{PM}} = \frac{\sum_{i=1}^n \left(E_{ti_{PM}} * T_{ti} \right)}{\sum_{i=1}^n T_{ti}}$$

Where,

$E_{C_{PM}}$ = The mass-weighted PM emissions for the secondary aluminum production unit;

$E_{ti_{PM}}$ = Measured PM emissions for individual emission unit **i**;

T_{ti} = The average feed rate for individual emission unit **i** during the operating cycle or performance test period; and

n = The number of emission units in the secondary aluminum production unit.

Compliance is achieved if the mass-weighted emissions for the secondary aluminum production unit $E_{C_{PM}}$ is less than or equal to the emission limit for the secondary aluminum production unit $L_{C_{PM}}$ calculated using equation 1 in 40 CFR 63.1505(k) (Condition No. 3.3.2(a)).

- b. Use the following equation to compute the aluminum mass-weighted HCl emissions for the secondary aluminum production unit.

$$E_{C_{HCl}} = \frac{\sum_{i=1}^n \left(E_{ti_{HCl}} * T_{ti} \right)}{\sum_{i=1}^n T_{ti}}$$

Where,

$E_{C_{HCl}}$ = The mass-weighted HCl emissions for the secondary aluminum production unit;

$E_{ti_{HCl}}$ = Measured HCl emissions for individual emission unit **i**;

Compliance is achieved if the mass-weighted emissions for the secondary aluminum production unit $E_{C_{HCl}}$ is less than or equal to the emission limit for the

secondary aluminum production unit $L_{C_{HCl}}$ calculated using equation 2 in 40 CFR 63.1505(k) (Condition No. 3.3.2(b)).

- c. Use the following equation to compute the aluminum mass-weighted D/F emissions for the secondary aluminum production unit.

$$E_{C_{D/F}} = \frac{\sum_{i=1}^n \left(E_{ti_{D/F}} * T_{ti} \right)}{\sum_{i=1}^n T_{ti}}$$

Where,

$E_{C_{D/F}}$ = The mass-weighted D/F emissions for the secondary aluminum production unit;

$E_{ti_{D/F}}$ = Measured D/F emissions for individual emission unit i ;

Compliance is achieved if the mass-weighted emissions for the secondary aluminum production unit $E_{C_{D/F}}$ is less than or equal to the emission limit for the secondary aluminum production unit $L_{C_{D/F}}$ calculated using equation 3 in 40 CFR 63.1505(k) (Condition No. 3.3.2(c)).

- d. As an alternative to using the equations in paragraphs a, b, and c of this Condition, the Permittee may demonstrate compliance for a secondary aluminum production unit by demonstrating that each existing group 1 furnace (F115 and F125) is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) (Condition No. 3.3.1) and that each existing in-line fluxer (PIF1 and PIF2) is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

5.2 Specific Monitoring Requirements

- 5.2.8 The operation, maintenance and monitoring (OM&M) plan must be accompanied by a written certification by the responsible official that the OM&M plan satisfies all requirements of 40 CFR 63.1510(b) and is otherwise consistent with the requirements of 40 CFR 63 Subpart RRR. The Permittee must comply with all provisions of the OM&M plan as submitted to the Division, unless and until the plan is revised in accordance with the following procedures. If the Division determines at any time after receipt of the OM&M plan that any revisions to the plan are necessary to satisfy the requirements of 40 CFR 63, Subpart RRR, the Permittee must promptly make all necessary revisions and resubmit the revised plan. If the Permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the Permittee

submits a description of the changes and a revised plan incorporating them to the Division. Each plan must contain the following information:

[40 CFR 63.1510(b)]

- a. Process parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device;
- b. A monitoring schedule for each affected source and emission unit;
- b. Procedures for the proper operation and maintenance of each process unit used to meet the applicable emission limits or standards in 40 CFR 63.1505;
- d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturers instructions; and
- e. Procedures for monitoring process parameters and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- f. Corrective actions to be taken when process or operating parameters deviate from the value or range established in paragraph (a) of this Condition, including;
 - i. Procedures to determine and record the cause of a deviation or an excursion, and the time the deviation or excursion began and ended; and
 - ii. Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- g. A maintenance schedule for each process that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) (Condition No. 5.3.1) for each furnace (F115 and F125).

6.2 Specific Record Keeping and Reporting Requirements Reports

6.2.12 In addition to the general records required by 40 CFR 63.10(b), the Permittee must maintain records of:

[40 CFR 63.1517(b)]

- a. For each furnace (F115 and F125) or in-line fluxer (PIF1 and PIF2), records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux),

- including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
[40 CFR 63.1517(b)(5)]
- b. For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
[40 CFR 63.1517(b)(7)]
- c. Approved site-specific monitoring plan for furnaces (F115 and F125) with records documenting conformance with the plan.
[40 CFR 63.1517(b)(8)]
- d. Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.
[40 CFR 63.1517(b)(13)]
- e. Records of any alternative monitoring or test procedure.
[40 CFR 63.1517(b)(15)]
- f. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including;
[40 CFR 63.1517(b)(16)]
- i. Startup, shutdown, and malfunction plan;
- ii. An OM&M plan; and
- iii. Site-specific secondary aluminum production unit emission plan if applicable.
- g. Except as provided for in Condition 5.3.6, for each secondary aluminum production unit, records of total charge weight, or if the Permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
[40 CFR 63.1517(b)(17)]
- 6.2.18 The Permittee shall maintain a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used each compliance period, unless the material is tracked by weight.
[40 CFR 63.3930(e)]
- 6.2.20 If using the “emission rate without add-on control option”, the Permittee shall maintain the density of each coating, thinner and/or other additive and cleaning materials used. The density does not need to be determined if the permittee monitors consumption by weight instead of volume.
[40 CFR 63.3930(g), 40 CFR 63.3951(c), and 40 CFR 63.3951(d)]

- 6.2.21 If using the “emission rate without add-on control option”, and the Permittee uses the allowance for organic HAP contained in waste, then the facility must keep records of the name and address of the treatment, storage or disposal facility (TSDF) to which waste materials were sent, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the TSDF, the date of each shipment to the TSDF, identification of the coating operations producing waste materials included in each shipment and the months in which the facility used the allowance for the materials, and the methodology used in accordance with 40 CFR 63.3951(e)(4), calculations, and supporting data used to determine the amount of waste material sent to the TSDF or the amount collected, stored and designated for transport to a TSDF each month and the methodology to determine the mass of organic HAP contained in the waste materials. This must include the source of all data used in the determination, method used to generate the data, frequency of testing or monitoring and supporting calculations and documentation including the waste manifest for each shipment.

[40 CFR 63.3930(h)]