



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 6-4058-00003/00365
Effective Date:

Expiration Date:

Permit Issued To:ALCOA INC
201 ISABELLA ST
PITTSBURGH, PA 15212-5858

Contact: ROBERT J LENNEY
ALCOA INC
PO BOX 150
MASSENA, NY 13662-0150
(315) 764-4161

Facility: ALCOA MASSENA OPERATIONS (WEST PLANT)
PARK AVE E
MASSENA, NY 13662

Contact: ROBERT J LENNEY
ALCOA INC
PO BOX 150
MASSENA, NY 13662-0150
(315) 764-4161

Description:
Title V permit renewal.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: LAWRENCE R AMBEAU
NYSDEC - STATE OFFICE BLDG
317 WASHINGTON ST
WATERTOWN, NY 13601

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted to the Department for approval.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:ALCOA INC
201 ISABELLA ST
PITTSBURGH, PA 15212-5858

Facility: ALCOA MASSENA OPERATIONS (WEST PLANT)
PARK AVE E
MASSENA, NY 13662

Authorized Activity By Standard Industrial Classification Code:
3334 - PRIMARY ALUMINUM
3354 - ALUMINUM EXTRUDED PRODUCTS
3355 - ALUMINUM ROLLING & DRAWING NEC

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 202-2.1: Compliance Certification
- 7 6 NYCRR 202-2.5: Recordkeeping requirements
- 8 6 NYCRR 215.2: Open Fires - Prohibitions
- 9 6 NYCRR 200.7: Maintenance of Equipment
- 10 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 12 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 13 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 14 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 15 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 16 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 17 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR 201-3.2 (c) (17): Surface Coating Exemption
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 23 6 NYCRR 201-6.5 (e): Compliance Certification
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR 211.1: Air pollution prohibited
- 26 6 NYCRR 212.4 (a): Compliance Certification
- 27 6 NYCRR 212.4 (a): Compliance Certification
- 28 6 NYCRR 212.4 (c): Compliance Certification
- 29 6 NYCRR 212.4 (c): Compliance Certification
- 30 6 NYCRR 212.5 (d): Compliance Certification
- 31 6 NYCRR 212.6 (a): Compliance Certification
- 32 6 NYCRR 212.10 (c) (1): Compliance Certification
- 33 6 NYCRR 212.10 (c) (1): Compliance Certification
- 34 6 NYCRR 212.10 (c) (1): Compliance Certification
- 35 6 NYCRR 212.10 (c) (3): Compliance Certification
- 36 6 NYCRR 227-1.3 (a): Compliance Certification
- 37 6 NYCRR 227.2 (b) (1): Compliance Certification
- 38 6 NYCRR 249.3 (a): Compliance Certification
- 39 6 NYCRR Subpart 257-8: Compliance Certification
- 40 40CFR 52.21, Subpart A: Compliance Certification
- 41 40CFR 52.21, Subpart A: Compliance Certification
- 42 40CFR 52.21, Subpart A: Compliance Certification
- 43 40CFR 63, Subpart A: General Provisions



- 44 40CFR 63.841, Subpart LL: Incorporation by Reference
- 45 40CFR 63.847(b), Subpart LL: Compliance Provisions - Test Plan
- 46 40CFR 63.849(a), Subpart LL: Reference test methods for TF and POM emissions
- 47 40CFR 63.849(e), Subpart LL: Alternative test methods for TF or POM emissions
- 48 40CFR 63.850(d), Subpart LL: Compliance Certification
- 49 40CFR 63.850(e)(1), Subpart LL: Compliance Certification
- 50 40CFR 63.850(e)(2), Subpart LL: Compliance Certification
- 51 40CFR 63.850(e)(3), Subpart LL: Compliance Certification
- 52 40CFR 63.1500(b), Subpart RRR: Applicability
- 53 40CFR 63.1501(b), Subpart RRR: Compliance dates for new/reconstructed sources
- 54 40CFR 63.1505(c)(1), Subpart RRR: Compliance Certification
- 55 40CFR 63.1505(c)(2), Subpart RRR: Compliance Certification
- 56 40CFR 63.1505(i), Subpart RRR: Compliance Certification
- 57 40CFR 63.1505(j)(1), Subpart RRR: Compliance Certification
- 58 40CFR 63.1505(j)(2), Subpart RRR: Compliance Certification
- 59 40CFR 63.1505(k)(1), Subpart RRR: SAPU PM Emission Limit Calculation
- 60 40CFR 63.1505(k)(2), Subpart RRR: HCl emission limit SAPU calculation
- 61 40CFR 63.1505(k)(3), Subpart RRR: SAPU Dioxin/Furan Emission Limit Calculation
- 62 40CFR 63.1510(b), Subpart RRR: Monitoring and Compliance Requirements - OM&M Plan
- 63 40CFR 63.1510(s), Subpart RRR: Site-specific requirements for secondary aluminum processing units
- 64 40CFR 63.1511(a), Subpart RRR: Site Specific test plan required
- 65 40CFR 63.1511(c), Subpart RRR: Test Methods
- 66 40CFR 63.1511(e), Subpart RRR: Compliance Certification
- 67 40CFR 63.1512(b), Subpart RRR: Compliance Certification
- 68 40CFR 63.1512(h)(2), Subpart RRR: Compliance Certification
- 69 40CFR 63.1512(j), Subpart RRR: Compliance Certification
- 70 40CFR 63.1515, Subpart RRR: Secondary Aluminum Notifications
- 71 40CFR 63.1516, Subpart RRR: Compliance Certification
- 72 40CFR 63.1517, Subpart RRR: Secondary Aluminum MACT Recordkeeping
- 73 40CFR 63, Subpart ZZZZ: Applicability
- 74 40 CFR Part 64: Compliance Certification

Emission Unit Level

- 75 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 76 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 77 6 NYCRR Subpart 201-7: Process Permissible Emissions
- 78 40CFR 63.1515(b), Subpart RRR: Compliance Certification

EU=A-00003,Proc=FBB

- 79 40CFR 63.1511(b), Subpart RRR: Initial Performance Test
- 80 40CFR 63.1513(b), Subpart RRR: Equations for determining compliance - PM, HCl and D/F emission limits.

EU=A-00003,Proc=MH2

- 81 6 NYCRR 212.5 (d): Compliance Certification
- 82 40CFR 63.1511(g), Subpart RRR: Establishment of Monitoring and Operating Parameter Values



EU=B-00001

- 83 6 NYCRR 227-1.6: Corrective Action
- 84 6 NYCRR 227-1.7: General Provisions
- 85 6 NYCRR 249.3 (a): Compliance Certification
- 86 6 NYCRR 249.3 (a): Compliance Certification

EU=B-00001,Proc=OIL

- 87 6 NYCRR 225-1.2 (d): Compliance Certification
- 88 6 NYCRR 225-1.7 (c): Compliance Certification
- 89 6 NYCRR 225-1.7 (d): Records retention
- 90 6 NYCRR 225-1.7 (e): Compliance Certification
- 91 6 NYCRR 225-1.8 (a): Compliance Certification
- 92 6 NYCRR 225-1.8 (d): Sampling, compositing, and analysis of fuel samples
- 93 6 NYCRR 227-1.3 (a): Compliance Certification
- 94 6 NYCRR 227-1.4 (b): Compliance Certification
- 95 6 NYCRR 249.3 (a): Compliance Certification

EU=C-00001

- 96 6 NYCRR 231-2.2 (d) (3): Compliance Certification
- 97 6 NYCRR 231-2.2 (d) (3): Compliance Certification
- 98 40CFR 52.21(i)(1), Subpart A: Compliance Certification

EU=C-00001,Proc=CD1

- 99 6 NYCRR 212.9 (b): Compliance Certification

EU=C-00001,Proc=CM1

- 100 40CFR 63.1513(d), Subpart RRR: Conversion of D/F measurements to TEQ units

EU=C-00001,EP=I0029,Proc=CD1

- 101 6 NYCRR 212.4 (a): Compliance Certification
- 102 6 NYCRR 212.4 (a): Compliance Certification

EU=C-00001,EP=I0030,Proc=CM1,ES=C0030

- 103 6 NYCRR 212.10 (c) (3): Compliance Certification

EU=C-00002

- 104 6 NYCRR 231-2.2 (d) (3): Compliance Certification
- 105 6 NYCRR 231-2.2 (d) (3): Compliance Certification
- 106 40CFR 52.21(i)(1), Subpart A: Compliance Certification

EU=C-00002,Proc=CD2

- 107 6 NYCRR 212.4 (a): Compliance Certification
- 108 6 NYCRR 212.4 (a): Compliance Certification
- 109 6 NYCRR 212.4 (a): Compliance Certification

EU=F-00001

- 110 6 NYCRR 212.10 (c) (1): RACT analysis not required for emission points less than 3 lb/hr VOC or NOx
- 111 6 NYCRR 212.10 (c) (1): Compliance Certification



EU=M-00001

- 112 6 NYCRR 212.4 (a): Compliance Certification
- 113 6 NYCRR 212.5 (d): Compliance Certification
- 114 40CFR 63.1511(f), Subpart RRR: Testing of Representative Emission Units
- 115 40CFR 63.1512(k), Subpart RRR: Performance Test/Compliance
Demonstration Requirements and Procedures - Feed/Charge Weight
Measurement.
- 116 40CFR 63.1513(e), Subpart RRR: Equation to Calculate SAPU HCl emissions
- 117 40CFR 63.1513(e), Subpart RRR: Equation to show compliance with
SAPU particulate emission limit

EU=M-00001,Proc=MHS

- 118 40CFR 63.1512(e), Subpart RRR: Compliance demonstration
requirements for Group 1 Furnaces without add on control devices

EU=M-00001,Proc=MHS,ES=M003A

- 119 6 NYCRR 231-11.2 (b): Compliance Certification
- 120 40CFR 63.1505(i), Subpart RRR: Compliance Certification
- 121 40CFR 63.1505(i), Subpart RRR: Compliance Certification
- 122 40CFR 63.1505(i), Subpart RRR: Compliance Certification

EU=M-00002

- 123 6 NYCRR 212.4 (a): Compliance Certification
- 124 6 NYCRR 212.5 (d): Compliance Certification
- 125 40CFR 63.1505(k)(4), Subpart RRR: SAPU emission limits for
individual emission units
- 126 40CFR 63.1512(o), Subpart RRR: Flux Injection Rate compliance
demonstration requirements
- 127 40CFR 63.1512(r), Subpart RRR: Compliance Certification

EU=P-00001,Proc=PWS

- 128 6 NYCRR Part 226: Compliance Certification

EU=S-00001,Proc=POT

- 129 6 NYCRR 212.9 (d): Compliance Certification
- 130 6 NYCRR 249.3 (a): Compliance Certification
- 131 6 NYCRR 249.3 (a): Compliance Certification
- 132 40CFR 63.843(a)(1)(i), Subpart LL: Compliance Certification
- 133 40CFR 63.847(d)(1), Subpart LL: Compliance Certification
- 134 40CFR 63.847(d)(3), Subpart LL: Performance Test Requirements -
Previous Control Device Tests
- 135 40CFR 63.847(e)(1), Subpart LL: Potline TF emission rate calculation
- 136 40CFR 63.847(e)(5), Subpart LL: Procedure to determine weights
- 137 40CFR 63.847(e)(6), Subpart LL: Compliance Certification
- 138 40CFR 63.847(h)(1), Subpart LL: Compliance Certification
- 139 40CFR 63.847(h)(1), Subpart LL: Compliance Certification
- 140 40CFR 63.847(h)(3), Subpart LL: Compliance Certification
- 141 40CFR 63.848(a), Subpart LL: Compliance Certification
- 142 40CFR 63.848(e)(1), Subpart LL: Reduced sampling frequency -
contents of request letter
- 143 40CFR 63.848(e)(2), Subpart LL: Reduced sampling frequency request
- contents of the approved alternative requirement



- 144 40CFR 63.848(f)(1), Subpart LL: Compliance Certification
- 145 40CFR 63.848(g), Subpart LL: Compliance Certification

EU=S-00001,Proc=POT

- 146 40CFR 63.848(h), Subpart LL: Corrective action procedures
- 147 40CFR 63.848(i), Subpart LL: Exceedances
- 148 40CFR 63.848(j), Subpart LL: Compliance Certification
- 149 40CFR 63.848(k), Subpart LL: Accuracy and calibration requirements
- 150 40CFR 63.848(l), Subpart LL: Alternative operating parameters
- 151 40CFR 63.849(c), Subpart LL: Definition of potline in Method 14
- 152 40CFR 63.849(d), Subpart LL: Installation of manifolds for potlines
subject to Method 14
- 153 40CFR 63.850(b), Subpart LL: Performance test reports
- 154 40CFR 63.850(c)(1), Subpart LL: Startup, shutdown, and malfunction
plan and reports
- 155 40CFR 63.850(c)(2), Subpart LL: Startup, shutdown, and malfunction
plan and reports
- 156 40CFR 63.850(e)(4), Subpart LL: Compliance Certification

EU=S-00002,Proc=BAK

- 157 6 NYCRR 249.3 (a): Compliance Certification
- 158 6 NYCRR 249.3 (a): Compliance Certification
- 159 40CFR 63.843(c)(1), Subpart LL: Compliance Certification
- 160 40CFR 63.843(c)(2), Subpart LL: Compliance Certification
- 161 40CFR 63.847(d)(4), Subpart LL: Compliance Certification
- 162 40CFR 63.847(d)(4), Subpart LL: Compliance Certification
- 163 40CFR 63.847(e)(3), Subpart LL: Calculation of anode bake furnace
TF emission rate
- 164 40CFR 63.847(e)(4), Subpart LL: Calculation of anode bake furnace
POM emission rate
- 165 40CFR 63.847(e)(7), Subpart LL: Compliance Certification
- 166 40CFR 63.847(h)(3), Subpart LL: Compliance Certification
- 167 40CFR 63.848(c), Subpart LL: Compliance Certification
- 168 40CFR 63.848(c), Subpart LL: Compliance Certification
- 169 40CFR 63.848(f)(1), Subpart LL: Compliance Certification
- 170 40CFR 63.848(j), Subpart LL: Compliance Certification
- 171 40CFR 63.850(e)(4), Subpart LL: Compliance Certification

EU=S-00002,Proc=BAK,ES=SS78S

- 172 40CFR 63.847(h)(1), Subpart LL: Compliance Certification

EU=S-00002,EP=S0078,Proc=BAK,ES=SS078

- 173 6 NYCRR 212.10 (c) (3): Compliance Certification
- 174 6 NYCRR 212.10 (c) (3): Compliance Certification

EU=S-00003

- 175 40CFR 63.847(h)(3), Subpart LL: Compliance Certification
- 176 40CFR 63.848(f)(2), Subpart LL: Compliance Certification
- 177 40CFR 63.848(f)(2), Subpart LL: Compliance Certification

EU=S-00003,Proc=GMS

- 178 40CFR 63.843(b), Subpart LL: Emission Limits for Existing Sources -



Paste Production Plants

- 179 40CFR 63.847(f), Subpart LL: Initial compliance provisions for paste production plants
- 180 40CFR 63.850(e)(4), Subpart LL: Compliance Certification

EU=S-00003,Proc=GMS,ES=SS100

- 181 40CFR 63.847(h)(2), Subpart LL: Compliance Certification
- 182 40CFR 63.847(h)(2), Subpart LL: Compliance Certification

EU=S-00004,Proc=M16

- *183 6 NYCRR Subpart 201-7: Capping Monitoring Condition

EU=S-00005,Proc=PST

- 184 6 NYCRR 212.10 (c) (1): Compliance Certification

EU=S-00005,Proc=PUN

- 185 6 NYCRR 212.10 (c) (1): Compliance Certification

EU=W-00001,Proc=WWT

- 186 6 NYCRR 212.4 (a): Compliance Certification
- 187 6 NYCRR 212.4 (a): Compliance Certification
- 188 6 NYCRR 212.10 (c) (1): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 189 ECL 19-0301: Contaminant List
- 190 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 191 6 NYCRR Part 209: Compliance Demonstration
- 192 6 NYCRR 209.4: Emissions other than total fluorides
- 193 6 NYCRR 211.2: Visible Emissions Limited
- 194 6 NYCRR 212.4 (a): Compliance Demonstration
- 195 6 NYCRR 212.4 (a): Compliance Demonstration
- 196 6 NYCRR 227-2.4 (b) (1): Compliance Demonstration
- 197 6 NYCRR 249.3 (f): Compliance Demonstration

Emission Unit Level

EU=B-00001,Proc=OIL

- 198 6 NYCRR 227-1.4 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.5 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.5 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and reporting of compliance monitoring
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c)

Item 3.1:



The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum



frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification



Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 7: Recordkeeping requirements
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 7.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 8: Open Fires - Prohibitions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 215.2

Item 8.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 8.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and



Applicable Federal Requirement:6 NYCRR 200.7

Item 9.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 10: Recycling and Salvage
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 10.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 11: Prohibition of Reintroduction of Collected Contaminants to the air
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 11.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 12: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 12.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 13: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 13.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part



may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

**Condition 14: Standard Requirement - Provide Information
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 14.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 15: General Condition - Right to Inspect
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 15.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 16: Standard Requirements - Progress Reports
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 16.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at



least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 17: Off Permit Changes
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)

Item 17.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.
Effective for entire length of Permit

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities



Item 22.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-00001

Emission Unit Description:

Process heaters treat solid aluminum and emit small quantities of process emissions due to residuals on the aluminum. Emissions co-mingle with products of combustion (poc) from natural gas burners.

Building(s): 131
140
222
234

Item 22.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-00003

Emission Unit Description:

This emission unit contains three processes: HM1, FBB and MH2. Process HM1: Process heaters treat solid aluminum and emit small quantities of process emissions due to residuals on the aluminum. Emissions co-mingle with products-of-combustion (poc) from natural gas burners.

Process MH2: Molten aluminum melting and holding furnaces which are permitted to use salt fluxes. All furnaces are reverberatory, center charged. No gas fluxing is done in any furnace.

Process FBB: In-line filter box fluxing units use a mixture of argon and chlorine gas to purify molten aluminum as it is being cast into ingots or rod.

Building(s): 221
222

Item 22.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-00001

Emission Unit Description:

Four virtually identical package boilers firing either natural gas or #6 fuel oil.

Building(s): 216A

Item 22.4:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: C-00001

Emission Unit Description:

Chip dryer #1 with associated control equipment (cyclone

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and afterburner) and chip melter #1.

Building(s): 221

Item 22.5:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: C-00002

Emission Unit Description:

Chip dryer #2 with associated control equipment (cyclone and afterburner) and chip melter #2.

Building(s): 221

Item 22.6:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: D-00001

Emission Unit Description:

Miscellaneous point sources.

Building(s): 140
220
222

Item 22.7:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: F-00001

Emission Unit Description:

Alcoa Fabricating and Extrusion (AFE) fugitives.

Building(s): 131
140
220
222

Item 22.8:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: M-00001

Emission Unit Description:

Aluminum melting and holding furnaces. All furnaces are reverberatory, center charged. Furnaces charge molten aluminum, uniform, non-uniform and clean scrap, alloying ingredients and salt. No gas fluxing is done in any furnace.

Building(s): 221

Item 22.9:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: M-00002

Emission Unit Description:

In-line filterbox fluxing units use a mixture of argon and chlorine gas to purify molten aluminum as it is being



Material handling operations for alumina, carbon, and other miscellaneous solid materials. Each are controlled by a fabric filter to limit particulate emissions to the environment.

Building(s): 332
344
351
354B
354C
378
380
435
440A
440E
440H
441
441C
446A
446B
446C
469

Item 22.15:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: S-00005

Emission Unit Description:

Coal tar pitch unloading and storage. Includes fugitives from the pitch unloading pumps and pitch recirculating pumps.

Building(s): 352B
352F

Item 22.16:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: S-00006

Emission Unit Description:

Smelting and anode plant fugitives excepting potline fugitives (the potline fugitives are regulated under Primary Aluminum NESHAP regulations).

Building(s): 314
332
350
351
352B
370
372
374
376
380



Item 22.17:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: W-00001

Emission Unit Description:

Wastewater treatment operations.

Building(s): 79C

**Condition 23: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.5 (e)

Item 23.1:

The Compliance Certification activity will be performed for the Facility.

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
 - and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

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iii. Compliance certifications shall be submitted annually. Certification reports are due after the anniversary date of four consecutive calendar quarters as specified below. The first report is due after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

State Office Building
317 Washington Street
Watertown, NY 13601-3787

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due on the same day each year

**Condition 24: Non Applicable requirements
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-6.5 (g)

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.



6 NYCRR 212.4 (c)

Emission Unit: M00002

Reason: This emission unit will be complying with the particulate matter (PM) emission limits contained in the Secondary Aluminum Production NESHAP (40 CFR 63 Subpart RRR) and thus is exempt from the PM limits codified at 6 NYCRR Part 212.4(c) as allowed for at 6 NYCRR Part 212.5(d).

6 NYCRR 212.4 (c)

Emission Unit: M00001

Reason: This emission unit will be complying with the particulate matter (PM) emission limits contained in the Secondary Aluminum Production NESHAP (40 CFR 63 Subpart RRR) and thus is exempt from the PM limits codified at 6 NYCRR Part 212.4(c) as allowed for at 6 NYCRR Part 212.5(d).

6 NYCRR 212.10 (f)

Emission Unit: S00003 Emission Point: S0100 Process: GMS

Source: SS100

Reason: The emissions of volatile organic compounds (VOC) from the Greenmill Petroleum Coke Dry Scrubber (Emission Unit - S-00003; Emission Source - SS100) are less than 3.0 lb/hr. Therefore the reasonably available control technology (RACT) requirements for VOC contained in 6 NYCRR Part 212.10(f) do not apply to this emission source. Emissions of polycyclic organic matter (POM) are not considered VOC for the purposes of this RACT determination.

6 NYCRR 225-1.7 (b)

Emission Unit: B00001 Process: OIL

Reason: The requirement for an sulfur dioxide (SO₂) continuous emissions monitoring system (CEMS) does not apply since Alcoa meets the exception contained in 6 NYCRR Part 225-1.7(b)(2) by virtue of performing the sampling and recordkeeping contained in the permit condition cited at 6 NYCRR Part 225-1.8(a).

6 NYCRR 231-2.2

Reason: The net emissions increases for the Alcoa Modernization project are outlined below:

- NO_x = 24.2 tpy

- VOC = 3.9 tpy

Since all net emissions increases are less than the significant project threshold the New Source Review in Nonattainment Areas requirements of 6 NYCRR Part 231-2 do not apply to this project.

40 CFR Part 52, Subpart A

Reason: The net emissions increases for the Alcoa Modernization project are outlined below:



- NO_x = -10.0 tpy
- SO₂ = -0.5 tpy
- Total Fluoride = -4.2 tpy
- PM = -669.2 tpy
- PM-10 = -181.6 tpy
- PM-2.5 = -370.2 tpy
- CO = -8,049.8 tpy

Since all net emissions increases are less than the significant project threshold the Prevention of Significant Deterioration (PSD) requirements of 40 CFR 52.21 do not apply to this project.

Condition 25: Air pollution prohibited
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 211.1

Item 25.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 26: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 26.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003
Process: MH2

Emission Unit: C-00001
Process: CD1

Emission Unit: C-00002
Process: CD2

Emission Unit: M-00001
Process: MHS

Regulated Contaminant(s):
CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of the above contaminants from the listed sources shall be screened using Department Policy DAR-1 for ambient air impacts within 180 days after issuance of the permit or after re-start of the units if they are not operating. The procedure shall be completed once, unless changes in the processes and emissions require another review of the impacts. Subsequent changes will require submission of the results with a permit application.

Reference Test Method: EPA Method 23

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 27: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00003

Process: FBB

Emission Unit: A-00003

Process: MH2

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) chlorine has been issued an environmental rating of B. The emission rate potential of chlorine from each emission source in this emission unit shall remain less than 10 pounds per hour. Compliance testing shall be completed upon request from the Department.



Parameter Monitored: CHLORINE
Upper Permit Limit: 10.0 pounds per hour
Reference Test Method: EPA RM 18
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 28: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

All emission sources (other than exempt and trivial activities) that employ control devices to limit particulate emissions, shall be monitored and maintained according to the Operation and Maintenance (O & M) plan approved by the Department in order to insure proper operation and control. The O & M plan shall be considered a "living" document and will be changed and improved over time. Each change shall be submitted to the department for approval. Monitoring parameter measurements made outside the normal operating ranges will trigger additional reporting according to the O&M Plan. Records shall be maintained for a minimum of five years.

Reference Test Method: EPA METHOD 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 29.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:



Emission Unit: A-00001
Process: EPH

Emission Unit: A-00001
Process: HMO

Emission Unit: A-00001
Process: HT1

Emission Point: F001A

Emission Unit: A-00001
Process: HT1

Emission Point: F001C

Emission Unit: A-00001
Process: HT1

Emission Point: F001D

Emission Unit: A-00001
Process: HT1

Emission Point: F0075

Emission Unit: A-00001
Process: HT1

Emission Point: F074A

Emission Unit: A-00001
Process: HT1

Emission Point: F074B

Emission Unit: A-00001
Process: HT2

Emission Unit: A-00003
Process: HM1

Emission Unit: C-00001

Emission Unit: C-00002

Emission Unit: D-00001
Process: ALB

Emission Unit: S-00002
Process: BAK

Emission Unit: S-00003
Process: ANC

Emission Point: S0101

Emission Unit: S-00003
Process: GMS

Emission Point: S0100

Emission Unit: S-00003
Process: GMS

Emission Source: SS100

Emission Unit: S-00004

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Emission Unit: S-00005
Process: PST

Emission Point: S0088

Emission Unit: S-00005
Process: PST

Emission Point: S0089

Emission Unit: S-00005
Process: PUN

Emission Unit: W-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions of solid particulates, with an environmental rating of B or C, that exceed 0.050 grains per dry standard cubic foot of exhaust gas. Stack testing will be conducted on these or similar sources to determine compliance upon the request of the Department.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 30: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212.5 (d)

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: S-00001
Process: POT

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 000463-58-1 CARBONYL SULFIDE
CAS No: 000630-08-0 CARBON MONOXIDE
CAS No: 007446-09-5 SULFUR DIOXIDE



Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Where a source owner can demonstrate to the satisfaction of the commissioner that he will apply best available control technology (BACT), the commissioner may specify a less restrictive permissible emission rate, emission standard or degree of air cleaning for such source than required under this Part provided that the less restrictive requirement is equivalent to that which can be achieved through the application of best available control technology.

Carbon Monoxide (CO), Carbonyl Sulfide (COS), and Sulfur Dioxide (SO₂) emissions from the anode bake furnace and the potline shall be controlled according to the BACT analysis submitted to the Department July 9, 2001 and approved by Albany staff.

The specification of % sulfur by weight in the coke used at the plant shall be 2.5% on an annual average basis rolled monthly. The sulfur content shall be determined from vendor test data for each lot of coke received for processing. The current annual average and any excursions above the limit shall be reported semiannually on a calendar year basis.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COKE

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 2.5 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 31.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001



Emission Unit: S-00005 Process: PST	Emission Point: S0088
Emission Unit: S-00005 Process: PST	Emission Point: S0089
Emission Unit: S-00005 Process: PUN	Emission Point: S0073
Emission Unit: S-00005 Process: PUN	Emission Point: S0077
Emission Unit: S-00005 Process: PUN	Emission Point: S073A
Emission Unit: W-00001	

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The department reserves the right to perform or require the performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (1)

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001	Emission Point: F0014
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Emission Unit: A-00001	Emission Point: F0015
Emission Unit: A-00001	Emission Point: F001A
Emission Unit: A-00001	Emission Point: F001C
Emission Unit: A-00001	Emission Point: F001D
Emission Unit: A-00001	Emission Point: F002A
Emission Unit: A-00001	Emission Point: F002B
Emission Unit: A-00001	Emission Point: F0075
Emission Unit: A-00001	Emission Point: F074A
Emission Unit: A-00001	Emission Point: F074B
Emission Unit: A-00001	Emission Point: I0014
Emission Unit: A-00001	Emission Point: I015A
Emission Unit: A-00001	Emission Point: I015B
Emission Unit: M-00001	Emission Point: I001A
Emission Unit: M-00001	Emission Point: I001B
Emission Unit: M-00001	Emission Point: I001C
Emission Unit: M-00001	Emission Point: I001D
Emission Unit: M-00001	Emission Point: I0034
Emission Unit: M-00001	Emission Point: I0035
Regulated Contaminant(s): CAS No: 0NY210-00-0	OXIDES OF NITROGEN

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate potential of oxides of nitrogen (NO_x) from each process and emission point listed above shall remain less than 3.0 pounds per hour. A reasonably available control technology (RACT) analysis is not required for emission points with NO_x emission rate potentials less than 3.0 pounds per hour at facilities located outside the lower Orange County and New York City

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metropolitan areas. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA RM 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 33: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (1)

Item 33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001 Emission Point: F0014

Emission Unit: A-00001 Emission Point: F0015

Emission Unit: A-00001 Emission Point: F002A

Emission Unit: A-00001 Emission Point: F002B

Emission Unit: A-00001

Process: HT1

Emission Unit: F-00001

Emission Unit: S-00005

Process: PUN

Emission Unit: W-00001

Process: WWT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate potential of Volatile Organic Compounds (VOCs) from each emission unit, process, and emission point listed above shall remain less than 3.0 pounds per hour. A reasonably available control technology (RACT)

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analysis is not required for emission points with VOC emission rate potentials less than 3.0 pounds per hour at facilities located outside the lower Orange County and New York City metropolitan areas. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: VOC

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA RM 18 or equivalent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 34: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (1)

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00003

Emission Point: I0047

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate potential of Volatile Organic Compounds (VOC) from each emission point listed above shall remain less than 3.0 pounds per hour. Actual emissions of VOC from each emission point listed above shall remain less than 15 pounds per day.

A reasonably available control technology (RACT) analysis is not required for emission points with VOC emission rate potentials less than 3.0 pounds per hour and actual emissions in the absence of control equipment less than 15.0 pounds per day at facilities located outside the lower Orange County and New York City metropolitan areas. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: VOC

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA RM 18 or equivalent

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 35: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001 Process: HMO	Emission Source: AI043
Emission Unit: A-00001 Process: HMO	Emission Source: AI046
Emission Unit: A-00003 Process: HM1	Emission Source: AI047
Emission Unit: A-00003 Process: MH2	Emission Source: M004A
Emission Unit: C-00002 Process: CD2	Emission Source: C0044
Emission Unit: C-00002 Process: CM2	Emission Source: C0045
Emission Unit: M-00001 Process: MHS	Emission Source: M003A
Emission Unit: M-00001 Process: MHS	Emission Source: M003C
Emission Unit: M-00001 Process: MHS	Emission Source: M024D
Emission Unit: M-00001 Process: MHS	Emission Source: M024F
Regulated Contaminant(s): CAS No: 0NY210-00-0	OXIDES OF NITROGEN

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

Low NOx burners are used on the above listed sources. Low NOx burners have been determined to meet the NOx RACT requirements of 6 NYCRR Part 212.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 36.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001 Process: HT1	Emission Point: FC01A Emission Source: AFC1A
Emission Unit: A-00001 Process: HT1	Emission Point: FC01C Emission Source: AFC1C
Emission Unit: A-00001 Process: HT1	Emission Point: FC01D Emission Source: AFC1D
Emission Unit: A-00001 Process: HT2	Emission Point: F078A Emission Source: AF78A
Emission Unit: A-00001 Process: HT2	Emission Point: F078B Emission Source: AF78B
Emission Unit: B-00001 Process: GAS	Emission Point: 00001 Emission Source: B0001
Emission Unit: B-00001 Process: GAS	Emission Point: 00001 Emission Source: B0002
Emission Unit: B-00001 Process: GAS	Emission Point: 00001 Emission Source: B0003
Emission Unit: B-00001 Process: GAS	Emission Point: 00001 Emission Source: B0004
Emission Unit: B-00001 Process: OIL	Emission Point: 00002 Emission Source: B0001
Emission Unit: B-00001 Process: OIL	Emission Point: 00002 Emission Source: B0002

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Emission Unit: B-00001
Process: OIL

Emission Point: 00002
Emission Source: B0003

Emission Unit: B-00001
Process: OIL

Emission Point: 00002
Emission Source: B0004

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in appendix A of 40 CFR 60. Testing shall be conducted upon request from the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 37: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227.2 (b) (1)

Item 37.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-00001
Process: OIL

Emission Point: 00001

Emission Unit: B-00001
Process: OIL

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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The two hour average emission of particulates from this stationary combustion installation shall not exceed 0.10 pounds per million Btu of heat input.

At the monitoring frequency stated below the facility shall perform the following:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emissions in a manner that will determine compliance with the limit cited in this condition.
- 2) Perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.
- 3) Submit an acceptable stack test report that outlines the results obtained from the testing done to meet the requirement of #2 above.
- 4) Facility shall keep records of all testing done at this stationary combustion installation for a period of 5 years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 38: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 249.3 (a)

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The specification of % sulfur by weight in the coke used at the plant shall be 2.5% on an annual average basis rolled monthly. This 2.5% limit is approved as the BART



limit for sulfur emissions for these two emission units.
The sulfur content shall be determined from vendor test data for each lot of coke received for processing. The current annual average and any excursions above the limit shall be reported semiannually on a calendar year basis.

Process Material: COKE

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 2.5 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 257-8

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Standards. a) Total Fluorides, part per million (ppm), dry weight basis (as F) in and on forage for consumption for grazing ruminants. Average concentration shall be less than the following in all levels:

- (1) For growing season (not to exceed six consecutive months) - 40 ppm
- (2) For any 60 day period - 60 ppm
- (3) For any 30 day period - 80 ppm

Measurement. (a) Total Fluorides in and on forage is determined by fusion of a representative sample by the Schoniger flash oxygen combustion method and analysis by specific ion electrode or other methods acceptable to the commissioner.

Alcoa shall continue Fluoride testing and reporting in accordance with the " Work/Quality Assurance Project Plan- Sampling and Anlysis for Fluoride in Vegetation" dated May 5, 1999 and it's amendments.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

All records required by this permit shall be kept on-site at the facility for the five most recent years, and upon request, must be made available for review by a NYSDEC representative.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 41: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 41.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003	Emission Source: M004D
Process: FBB	
Emission Unit: A-00003	Emission Source: AI047
Process: HM1	
Emission Unit: A-00003	Emission Source: M004A
Process: MH2	

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



The list of emission sources contained above shall not start-up until the three (3) soderberg potlines at the Reynolds Metals St. Lawrence Reduction Plant (Permit ID: 6-4058-00024/00077, Emission Unit P-OT001, Process A02, Emission Source 05152, 05354 & 05556) are shutdown. The start-up and shutdown of emission sources will occur over a period of months as portions of the pre-bake potline are energized and put in service. Facility will provide the Department with a detailed start-up and shutdown schedule at least 30 days prior to the energization of the first pot in the new pre-bake potline.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 42: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 52.21, Subpart A

Item 42.1:

The Compliance Certification activity will be performed for the Facility.

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following emission sources will begin permanent shut down upon start-up of the new pre-bake potline at the Reynolds Metals St. Lawrence Reduction Plant (Permit ID: 6-4058-00024/00077, Emission Unit P-OT001, Process B01, Emission Source PS001) which is part of the Alcoa modernization project. The start-up and shutdown of emission sources will occur over a period of months as portions of the pre-bake potline are energized and put in service. Facility will provide the Department with a detailed start-up and shutdown schedule at least 30 days prior to the energization of the first pot in the new pre-bake potline. The sources are: Emission unit A-00001, Process HMO, sources AI026 and AI027. Both sources being shut down are homogenizing heat treat furnaces.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 43: General Provisions
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63, Subpart A



Item 43.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: A00003
Process: MH2

Emission Unit: C00001

Emission Unit: C00002

Emission Unit: M00001

Emission Unit: M00002

Emission Unit: S00001

Emission Unit: S00002

Emission Unit: S00003

Item 43.2:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

**Condition 44: Incorporation by Reference
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.841, Subpart LL

Item 44.1:

This Condition applies to:

Emission Unit: S00001

Emission Unit: S00002

Emission Unit: S00003

Item 44.2:

(a) The following material is incorporated by reference in the corresponding sections noted. This incorporation by reference was approved by the Director of the Federal Register on October 7, 1997, in accordance with 5 U.S.C. 552(a) and 1 CFR Part 51. These materials are incorporated as they exist on the date of approval, and notice of any change in the materials will be published in the Federal Register. Revisions to ``Industrial Ventilation: A Manual of



Recommended Practice" (22nd ed.) are applicable only after publication of a document in the Federal Register to amend subpart LL to require use of the new information.

(1) Chapter 3, "Local Exhaust Hoods" and Chapter 5, "Exhaust System Design Procedure" of "Industrial Ventilation: A Manual of Recommended Practice," American Conference of Governmental Industrial Hygienists, 22nd edition, 1995, IBR approved for 40 CFR Part 63.843(b) and 40 CFR Part 63.844(b); and

(2) ASTM D 2986-95A, Standard Practice for Evaluation of Air Assay Media by the Monodisperse DOP (Diocetyl Phthalate) Smoke Test, IBR approved for section 7.1.1 of Method 315 in appendix A to 40 CFR Part 63.

(b) The materials incorporated by reference are available for inspection at the Office of the Federal Register, 800 North Capitol Street NW., Suite 700, 7th Floor, Washington, DC, and at the Air and Radiation Docket Center, U.S. EPA, 401 M Street, SW., Washington, DC. The materials also are available for purchase from one of the following addresses:

(1) Customer Service Department, American Conference of Governmental Industrial Hygienists (ACGIH), 1330 Kemper Meadow Drive, Cincinnati, Ohio 45240, telephone number (513) 742-2020; or

(2) American Society for Testing and Materials, 100 Bar Harbour Drive, West Conshohocken, Pennsylvania 19428, telephone number (610) 832-9500.

**Condition 45: Compliance Provisions - Test Plan
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.847(b), Subpart LL

Item 45.1:

The owner or operator shall prepare a site-specific test plan prior to the initial performance test according to the requirements of 40 CFR Part 63.7(c). The test plan must include procedures for conducting the initial performance test and for subsequent performance tests required in 40 CFR Part 63.848 for emission monitoring. In addition to the information required by 40 CFR Part 63.7, the test plan shall include:

(1) Procedures to ensure a minimum of three runs are performed annually for the primary control system for each source;

(2) For a source with a single control device exhausted through multiple stacks, procedures to ensure that at least three runs are performed annually by a representative sample of the stacks satisfactory to the applicable regulatory authority;

(3) For multiple control devices on a single source, procedures to ensure that at least one run is performed annually for each control device by a representative sample of the stacks satisfactory to the applicable regulatory authority;

(4) Procedures for sampling single stacks associated with multiple anode bake furnaces;

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Emission Unit: S00002
Process: BAK

Item 47.2:

The owner/operator may use an alternative test method for TF or POM emissions providing:

1) The owner/operator has already demonstrated the equivalency of the alternative method for a specific plant and has received previous approval from the Administrator or the New York State DEC for TF or POM measurements using the alternative methods; or

2) The owner/operator demonstrates to the satisfaction of the New York State DEC that the results from the alternative method meet the criteria specified in §§63.848(d)(1) and (d)(3) through (d)(6). The results from the alternative method shall be based on simultaneous sampling using the alternative method and the following reference methods:

For TF, Methods 13 and 14 or Method 14A in appendix A to part 60, or for POM, Method 315 in appendix A to part 63 and Method 14 in appendix A to part 60.

**Condition 48: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.850(d), Subpart LL

Item 48.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: S-00001
Process: POT

Emission Unit: S-00002
Process: BAK

Emission Unit: S-00003
Process: GMS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required in §63.10(e)(3), the owner/operator shall submit a report (or a summary report) if measured emissions are in excess of the applicable standard. The report shall contain the information specified in §63.10(e)(3)(v) and be submitted semiannually unless quarterly reports are required as a result of excess emissions.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(e)(1), Subpart LL

Item 49.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: S-00001

Process: POT

Emission Unit: S-00002

Process: BAK

Emission Unit: S-00003

Process: GMS

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall maintain files of all information (including all reports and notifications) required by §63.10(b) and by Subpart LL. Records must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained offsite.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 50: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(e)(2), Subpart LL

Item 50.1:

The Compliance Certification activity will be performed for the facility:

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Facility DEC ID: 6405800003



The Compliance Certification applies to:

Emission Unit: S-00001
Process: POT

Emission Unit: S-00002
Process: BAK

Emission Unit: S-00003
Process: GMS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator may retain records on microfilm, on a computer, on computer disks, on magnetic tape, or on microfiche.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(e)(3), Subpart LL

Item 51.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: S-00001
Process: POT

Emission Unit: S-00002
Process: BAK

Emission Unit: S-00003
Process: GMS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Facility DEC ID: 6405800003



The Compliance Certification applies to:

Emission Unit: C-00001
Process: CD1

Emission Unit: C-00002
Process: CD2

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a thermal chip dryer must not discharge or cause to be discharged to the atmosphere emissions in excess of 0.40 kilogram (kg) of THC, as propane, per megagram (Mg) (0.80 lb of THC, as propane, per ton) of feed/charge from a thermal chip dryer at a secondary aluminum production facility that is a major source.

Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: TOTAL HYDROCARBONS (THC)

Upper Permit Limit: 0.40 kilograms THC, as propane per Mg

Reference Test Method: EPA RM 25A or equivalent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 55: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1505(c)(2), Subpart RRR

Item 55.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: C-00001
Process: CD1

Emission Unit: C-00002
Process: CD2

Regulated Contaminant(s):

CAS No: 051207-31-9	2,3,7,8-TETRACHLORODIBENZOFURAN
CAS No: 040321-76-4	1,2,3,7,8-PENTACHLORODIBENZO-P-DIOXIN

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CAS No: 003268-87-9	1,2,3,4,6,7,8,9-OCTACHLORODIBENZODIOXIN
CAS No: 019408-74-3	1,2,3,7,8,9-HEXACHLORODIBENZO-P-DIOXIN
CAS No: 035822-46-9	1,2,3,4,6,7,8-HEPTACHLORODIBENZODIOXIN
CAS No: 039001-02-0	OCTACHLORODIBENZOFURANS, TOTAL
CAS No: 039227-28-6	1,2,3,4,7,8-HEXACHLORODIBENZO[B,E][1,4]DIOXIN
CAS No: 055673-89-7	1,2,3,4,7,8,9-HEPTACHLORODIBENZOFURAN
CAS No: 057117-31-4	2,3,4,7,8-PENTACHLORODIBENZOFURAN
CAS No: 057117-41-6	1,2,3,7,8-PENTACHLORODIBENZOFURAN
CAS No: 057117-44-9	1,2,3,6,7,8-HEXACHLORODIBENZOFURAN
CAS No: 057653-85-7	1,2,3,6,7,8-HEXACHLORODIBENZO-P-DIOXIN
CAS No: 060851-34-5	2,3,4,6,7,8-HEXACHLORODIBENZOFURAN
CAS No: 067562-39-4	1,2,3,4,6,7,8-HEPTACHLORODIBENZOFURAN
CAS No: 070648-26-9	1,2,3,4,7,8-HEXACHLORODIBENZOFURAN
CAS No: 072918-21-9	1,2,3,7,8,9-HEXACHLORODIBENZOFURAN
CAS No: 001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a thermal chip dryer must not discharge or cause to be discharged to the atmosphere emissions in excess of 2.50 micrograms (µg) of D/F TEQ per Mg (3.5 × 10⁻⁵ grams per ton) of feed/charge from a thermal chip dryer at a secondary aluminum production facility that is a major or area source.

Compliance testing shall be performed upon request from the Department.

Upper Permit Limit: 2.50 micrograms of D/F TEQ per Mg

Reference Test Method: EPA RM 23

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 56: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(i), Subpart RRR

Item 56.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 56.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a group 1 furnace must use the limit in this condition to determine the emission standards for a Secondary Aluminum Processing Unit pursuant to §63.1505(k). The limit for Dioxins/Furans is 15 ug of D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.

Upper Permit Limit: 15 micrograms of D/F TEQ per Mg

Reference Test Method: EPA Method 23

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 57: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(j)(1), Subpart RRR

Item 57.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00003

Process: FBB

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Except as provided in paragraph 40 CFR Part 63.1505(j)(3) of this section for an in-line fluxer using no reactive flux material, the owner or operator of an in-line fluxer must use the limits in this paragraph to determine the emission standards for a Secondary Aluminum Processing Unit (SAPU).

Hydrogen Chloride (HCl) emission limit = 0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge.

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The owner or operator may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

Upper Permit Limit: 0.04 pounds per ton

Reference Test Method: EPA RM 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 58: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1505(j)(2), Subpart RRR

Item 58.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00003

Process: FBB

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Except as provided in paragraph 40 CFR Part 63.1505(j)(3) of this section for an in-line fluxer using no reactive flux material, the owner or operator of an in-line fluxer must use the limits in this paragraph to determine the emission standards for a Secondary Aluminum Processing Unit (SAPU).

Particulate Matter (PM) emission limit = 0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge.

The owner or operator may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

Upper Permit Limit: 0.01 pounds per ton

Reference Test Method: EPA RM 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION



Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 59: SAPU PM Emission Limit Calculation
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(k)(1), Subpart RRR

Item 59.1:

On and after the compliance date established by §63.1501, the facility must comply with the emission limit calculated using the equation for PM in §63.1505(k)(1) for each secondary aluminum processing unit at a secondary aluminum facility that is a major source of HAP emissions. The facility may not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of the PM emission limit as calculated in equation 1 of §63.1501(k)(1).

The secondary aluminum processing unit shall be monitored according to the procedures in §63.1510(t) to determine compliance with this PM limit.

Note: In-line fluxers using no reactive flux materials cannot be included in this calculation since they are not subject to the PM limit.

**Condition 60: HCl emission limit SAPU calculation
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(k)(2), Subpart RRR

Item 60.1:

On and after the compliance date established by §63.1501, the facility must comply with the emission limit calculated using the equation for HCl in §63.1505(k)(2) for each secondary aluminum processing unit at a secondary aluminum facility that is a major source of HAP emissions. The facility may not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of HCl in excess of the HCl emission limit as calculated in equation 2 of §63.1501(k)(2).

The Secondary Aluminum Processing units shall be monitored according to the procedures in §63.1510(t) to determine compliance with the HCl limit.

Note: In-line fluxers using no reactive flux materials cannot be included in this calculation since they are not subject to this limit.

**Condition 61: SAPU Dioxin/Furan Emission Limit Calculation
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(k)(3), Subpart RRR

Item 61.1:

On and after the compliance date established by §63.1501, the facility must comply with the emission limit calculated using the equation for dioxins/furans (D/F) in §63.1505(k)(3) for each



secondary aluminum processing unit at a secondary aluminum facility that is a major or area source of HAP emissions. The facility may not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of the D/F emission limit as calculated in equation 3 of §63.1501(k)(3).

The secondary aluminum processing unit shall be monitored according to the procedures in §63.1510(t) to determine compliance with this D/F limit.

Note: Clean charge furnaces cannot be included in this calculation since they are not subject to the D/F limit.

**Condition 62: Monitoring and Compliance Requirements - OM&M Plan
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1510(b), Subpart RRR

Item 62.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: A00003
Process: MH2

Emission Unit: C00001

Emission Unit: C00002

Emission Unit: M00001

Emission Unit: M00002

Item 62.2:

The owner or operator must prepare and implement for each new or existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan. The owner or operator must submit the plan to NYSDEC for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the NYSDEC for review and approval. Pending approval by the NYSDEC of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. The plan must be accompanied by a written certification by the owner or operator that the OM&M Plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The owner or operator must comply with all the provisions of the OM&M Plan as submitted to the NYSDEC, unless and until the plan is revised in accordance with the following procedures. If the NYSDEC determines at any time after receipt of the OM&M Plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the owner or operator must promptly make all necessary revisions and resubmit the revised plan. If the owner or operator determines that any other revisions of the OM&M Plan are necessary, such revisions will not become effective until the owner or operator submits a description of the changes and a revised plan incorporating them to the NYSDEC. Each plan must contain the following information:



(i) The identification of each emission unit in the secondary aluminum processing unit;

(ii) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;

(iii) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;

(iv) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and

(v) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in 40 CFR Part 63.1510(t).

(2) The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

(i) Any averaging among emissions of differing pollutants;

(ii) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;

(iii) The inclusion of any emission unit while it is shutdown; or

(iv) The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.

(3) To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the applicable permitting authority containing the information required by paragraph (1) of this condition and obtain approval of the applicable permitting authority prior to implementing any revisions.

**Condition 64: Site Specific test plan required
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1511(a), Subpart RRR

Item 64.1:

Prior to conducting a performance test required by 40 CFR Part 63 Subpart RRR, the owner or operator must prepare and submit a site-specific test plan meeting the requirements in 40 CFR Part 63.7(c).

**Condition 65: Test Methods
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1511(c), Subpart RRR



Item 65.1:

The owner or operator must use the following methods in appendix A to 40 CFR part 60 to determine compliance with the applicable emission limits or standards:

- (1) Method 1 for sample and velocity traverses.
- (2) Method 2 for velocity and volumetric flow rate.
- (3) Method 3 for gas analysis.
- (4) Method 4 for moisture content of the stack gas.
- (5) Method 5 for the concentration of PM.
- (6) Method 9 for visible emission observations.
- (7) Method 23 for the concentration of D/F.
- (8) Method 25A for the concentration of THC, as propane.

(9) Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the owner or operator must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.

**Condition 66: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1511(e), Subpart RRR

Item 66.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003
Process: FBB

Emission Unit: A-00003
Process: MH2

Emission Unit: M-00001

Emission Unit: M-00002

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of new or existing affected sources and emission units located at secondary aluminum

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production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 67: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1512(b), Subpart RRR

Item 67.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: C-00001
Process: CD1

Emission Unit: C-00002
Process: CD2

Regulated Contaminant(s):
CAS No: ONY100-00-0 HAP

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a thermal chip dryer must conduct a performance test to measure dioxin/furan emissions at the outlet of the control device while the unit processes only unpainted aluminum chips. The performance tests shall be performed according to the method listed in §63.1511(c) which requires Method 23 for dioxin/furans.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 68: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1512(h)(2), Subpart RRR

Item 68.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: A-00003
Process: FBB

Emission Unit: M-00002

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator may choose to limit the rate which reactive flux is added to an in-line fluxer and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all chlorine in the reactive flux added to the in-line fluxer is emitted as HCl. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.

If the owner or operator of any in-line flux box which has no ventilation duct work manifolded to any outlet or emission control device chooses to demonstrate compliance with the emission limit for HCl by limiting use of reactive chlorine flux and assuming all chlorine in the flux is emitted as HCl, compliance with the HCl limit shall also constitute compliance with the emission limit for PM, and no separate emission test for PM is required. In this case, the owner or operator of the unvented in-line flux box must utilize the maximum permissible PM emissions rate for the in-line flux boxes when determining the total emissions for any SAPU which includes the flux box.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 69: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1512(j), Subpart RRR

Item 69.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003
Process: FBB

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Emission Unit: A-00003
Process: MH2

Emission Unit: M-00001

Emission Unit: M-00002

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must conduct emission tests as described below. The results of the emission tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and TEQ/Mg of feed charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3 day, 24 hour rolling average emission rates using the equation in 40 cfr Part 63.1510(t). A performance test is required for:

(1) Each group 1 furnace processing only clean charge to measure emissions of PM and either

(i) Emissions of HCl (for the emission limit); or

(ii) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).

(2) Each group 1 furnace that processes other than clean charge to measure emissions of PM and D/F and either:

(i) Emissions of HCl (for the emission limit), or;

(ii) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).

(3) Each in-line fluxer to measure emissions of PM and HCl.

Monitoring Frequency: Once every five years

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 70: Secondary Aluminum Notifications
Effective for entire length of Permit**



Applicable Federal Requirement:40CFR 63.1515, Subpart RRR

Item 70.1:

- (1) As required by 40 CFR §63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.
- (2) As required by §63.9(b)(5), an owner or operator who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, must provide notification of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by §63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.
- (3) As required by §63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
- (4) Each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in §63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (b)(1) through (b)(10) of 40CFR §63.1515. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted.

**Condition 71: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1516, Subpart RRR

Item 71.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003
Process: FBB

Emission Unit: A-00003
Process: MH2

Emission Unit: C-00001
Process: CD1

Emission Unit: C-00001
Process: CM1



Emission Unit: C-00002
Process: CD2

Emission Unit: C-00002
Process: CM2

Emission Unit: M-00001
Process: MHA

Emission Unit: M-00001
Process: MHS

Emission Unit: M-00002
Process: FBA

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Startup, shutdown, and malfunction plan/reports: The owner or operator must develop a written plan as described in 40 CFR §63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by §63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in §63.6(e)(3). In addition to the information required in §63.6(e)(3), the plan must include:

- (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

Excess emissions/summary report. As required by §63.10(e)(3), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in §63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the

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reporting period. A report must be submitted if any of the conditions listed in 40 CFR §63.1516(b)(1) occur during a 6-month reporting period.

The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

Annual compliance certifications: For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:

- (1) Any period of excess emissions, as defined in paragraph (b)(1) of this section, that occurred during the year were reported as required by this subpart; and
- (2) All monitoring, recordkeeping, and reporting requirements were met during the year.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 72: Secondary Aluminum MACT Recordkeeping Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1517, Subpart RRR

Item 72.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: A00003
Process: MH2

Emission Unit: C00001

Emission Unit: C00002

Emission Unit: M00001



Emission Unit: M00002

Item 72.2:

(a) As required by §63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions (40 CFR 63 Subpart A) and 40 CFR 63 Subpart RRR.

(1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

(2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

(3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(b) In addition to the general records required by §63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain additional records listed in 40 CFR §63.1517(b)(1) through (b)(17) as applicable.

Condition 73: Applicability
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 73.1:

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

Condition 74: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40 CFR Part 64

Item 74.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: B-00001
Process: GAS Emission Source: B0001

Emission Unit: B-00001
Process: GAS Emission Source: B0002

Emission Unit: B-00001
Process: GAS Emission Source: B0003

Emission Unit: B-00001
Process: GAS Emission Source: B0004

Emission Unit: B-00001



Process: OIL	Emission Source: B0001
Emission Unit: B-00001 Process: OIL	Emission Source: B0002
Emission Unit: B-00001 Process: OIL	Emission Source: B0003
Emission Unit: B-00001 Process: OIL	Emission Source: B0004
Emission Unit: S-00004 Process: M04	Emission Source: SS090
Emission Unit: S-00004 Process: M06	Emission Source: SS23A
Emission Unit: S-00004 Process: M06	Emission Source: SS23B
Emission Unit: S-00004 Process: M06	Emission Source: SS23C
Emission Unit: S-00004 Process: M07	Emission Source: SS041
Emission Unit: S-00004 Process: M08	Emission Source: SS038
Emission Unit: S-00004 Process: M09	Emission Source: SS049
Emission Unit: S-00004 Process: M09	Emission Source: SS050
Emission Unit: S-00004 Process: M09	Emission Source: SS051
Emission Unit: S-00004 Process: M09	Emission Source: SS052
Emission Unit: S-00004 Process: M09	Emission Source: SS053
Emission Unit: S-00004 Process: M09	Emission Source: SS060
Emission Unit: S-00004 Process: M11	Emission Source: SS092
Emission Unit: S-00004 Process: M11	Emission Source: SS093

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Emission Unit: S-00004

Process: M12

Emission Source: SS043

Regulated Contaminant(s):

CAS No: 0NY210-00-0

OXIDES OF NITROGEN

CAS No: 0NY075-00-0

PARTICULATES

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission sources and emission control devices listed above shall be monitored and maintained according to the most recently submitted and Department approved Compliance Assurance Monitoring (CAM) plan for this facility in order to ensure proper operation and control. The CAM plan shall be considered a "living" document and will be changed and improved over time. Each change shall be submitted to the department for approval. Monitoring parameter measurements made outside normal operating ranges will trigger additional reporting according to the CAM Plan. Records shall be maintained for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

****** Emission Unit Level ******

**Condition 75: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 75.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00001

Emission Point: F0014

Height (ft.): 41

Diameter (in.): 25

NYTMN (km.): 4977.

NYTME (km.): 508.9

Building: 140

Emission Point: F0015

Height (ft.): 48

Diameter (in.): 25

NYTMN (km.): 4977.

NYTME (km.): 508.9

Building: 140

Emission Point: F001A

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Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 24 NYTME (km.): 508.9	Building: 131
Emission Point: F001C Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 24 NYTME (km.): 508.9	Building: 131
Emission Point: F001D Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 24 NYTME (km.): 508.9	Building: 131
Emission Point: F002A Height (ft.): 47 NYTMN (km.): 4977.	Diameter (in.): 21 NYTME (km.): 508.9	Building: 140
Emission Point: F002B Height (ft.): 47 NYTMN (km.): 4977.	Diameter (in.): 21 NYTME (km.): 508.9	Building: 140
Emission Point: F0075 Height (ft.): 47 NYTMN (km.): 4977.	Diameter (in.): 21 NYTME (km.): 508.9	Building: 131
Emission Point: F074A Height (ft.): 45 NYTMN (km.): 4977.	Diameter (in.): 12 NYTME (km.): 508.9	Building: 131
Emission Point: F074B Height (ft.): 45 NYTMN (km.): 4977.	Diameter (in.): 12 NYTME (km.): 508.9	Building: 131
Emission Point: F078A Height (ft.): 42 NYTMN (km.): 4976.66	Diameter (in.): 24 NYTME (km.): 509.387	Building: 140
Emission Point: F078B Height (ft.): 42 NYTMN (km.): 4976.66	Diameter (in.): 24 NYTME (km.): 509.387	Building: 140
Emission Point: FC01A Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 10 NYTME (km.): 508.9	Building: 131
Emission Point: FC01C Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 24 NYTME (km.): 508.9	Building: 131
Emission Point: FC01D Height (ft.): 50 NYTMN (km.): 4977.	Diameter (in.): 24 NYTME (km.): 508.9	Building: 131
Emission Point: I0014		



Height (ft.): 52 NYTMN (km.): 4977.	Diameter (in.): 42 NYTME (km.): 508.9	Building: 234
Emission Point: I0043 Height (ft.): 52 NYTMN (km.): 4977.	Diameter (in.): 54 NYTME (km.): 508.9	Building: 222
Emission Point: I0046 Height (ft.): 62 NYTMN (km.): 4976.66	Diameter (in.): 54 NYTME (km.): 509.387	Building: 222
Emission Point: I015A Height (ft.): 52 NYTMN (km.): 4977.	Diameter (in.): 42 NYTME (km.): 508.9	Building: 234
Emission Point: I015B Height (ft.): 52 NYTMN (km.): 4977.	Diameter (in.): 42 NYTME (km.): 508.9	Building: 234

Item 75.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00003		
Emission Point: I0047 Height (ft.): 62 NYTMN (km.): 4977.	Diameter (in.): 54 NYTME (km.): 508.9	Building: 222
Emission Point: I004A Height (ft.): 82 NYTMN (km.): 4977.	Diameter (in.): 79 NYTME (km.): 508.9	Building: 221

Item 75.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: B-00001		
Emission Point: 00001 Height (ft.): 60 NYTMN (km.): 4977.	Diameter (in.): 96 NYTME (km.): 508.9	Building: 216A
Emission Point: 00002 Height (ft.): 60 NYTMN (km.): 4977.	Diameter (in.): 96 NYTME (km.): 508.9	Building: 216A

Item 75.4:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: C-00001		
Emission Point: I0029 Height (ft.): 52	Diameter (in.): 36	



NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221
Emission Point: I0030
Height (ft.): 73 Diameter (in.): 42
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221

Item 75.5:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: C-00002
Emission Point: I0044
Height (ft.): 74 Diameter (in.): 36
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221
Emission Point: I0045
Height (ft.): 74 Diameter (in.): 44
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221

Item 75.6:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: D-00001
Emission Point: F0042
Height (ft.): 57 Diameter (in.): 19
NYTMN (km.): 4977. NYTME (km.): 509.9 Building: 140
Emission Point: I0042
Height (ft.): 50 Diameter (in.): 22
NYTMN (km.): 4977. NYTME (km.): 509.9 Building: 222

Item 75.7:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: M-00001
Emission Point: I001A
Height (ft.): 67 Diameter (in.): 32
NYTMN (km.): 4977.645 NYTME (km.): 508.314 Building: 221
Emission Point: I001B
Height (ft.): 67 Diameter (in.): 32
NYTMN (km.): 4977.604 NYTME (km.): 508.318 Building: 221
Emission Point: I001C
Height (ft.): 68 Diameter (in.): 20
NYTMN (km.): 4977.641 NYTME (km.): 508.316 Building: 221
Emission Point: I001D
Height (ft.): 68 Diameter (in.): 20
NYTMN (km.): 4977.626 NYTME (km.): 508.316 Building: 221



Emission Point: I0034
Height (ft.): 74 Diameter (in.): 32
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Emission Point: I0035
Height (ft.): 74 Diameter (in.): 32
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Emission Point: I003A
Height (ft.): 67 Diameter (in.): 33
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Emission Point: I003C
Height (ft.): 67 Diameter (in.): 79
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Emission Point: I024D
Height (ft.): 74 Diameter (in.): 50
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Emission Point: I024F
Height (ft.): 82 Diameter (in.): 79
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 221

Item 75.8:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: M-00002

Emission Point: I001E
Height (ft.): 67 Diameter (in.): 42
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221

Emission Point: I003E
Height (ft.): 67 Diameter (in.): 42
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 221

Emission Point: I024E
Height (ft.): 46 Diameter (in.): 8
NYTMN (km.): 4977.223 NYTME (km.): 508.928 Building: 221

Item 75.9:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: S-00001

Emission Point: PRV01
Height (ft.): 70 Length (in.): 20404 Width (in.): 120
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 401

Emission Point: SA398



Height (ft.): 78 Diameter (in.): 48
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 401

Item 75.10:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: S-00002

Emission Point: S0078
Height (ft.): 105 Diameter (in.): 84
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 351

Item 75.11:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: S-00003

Emission Point: S0100
Height (ft.): 11 Diameter (in.): 42
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 354C

Emission Point: S0101
Height (ft.): 34 Diameter (in.): 42
NYTMN (km.): 4976.66 NYTME (km.): 509.387 Building: 354C

Item 75.12:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: S-00004

Emission Point: S0015
Height (ft.): 19 Length (in.): 12 Width (in.): 12
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 332

Emission Point: S0016
Height (ft.): 23 Length (in.): 12 Width (in.): 12
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 332

Emission Point: S0038
Height (ft.): 15 Diameter (in.): 33
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 354B

Emission Point: S0041
Height (ft.): 42 Diameter (in.): 15
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 441

Emission Point: S0043
Height (ft.): 91 Diameter (in.): 15
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 441C

Emission Point: S0046
Height (ft.): 79 Diameter (in.): 10

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Emission Point: F0069
Height (ft.): 40 Diameter (in.): 3
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 79C

Emission Point: F0070
Height (ft.): 41 Diameter (in.): 12
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 79C

Emission Point: F0071
Height (ft.): 41 Diameter (in.): 10
NYTMN (km.): 4977. NYTME (km.): 508.9 Building: 79C

**Condition 76: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 76.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: EPH Source Classification Code: 2-02-002-02
Process Description:
TWO (2) 6500 TON PRESS PRE-HEATS AND ONE
(1) 5300 TON PRESS PRE-HEAT FURNACE. EACH
USES MULTIPLE DIRECT FIRE NATURAL GAS
BURNERS.

Emission Source/Control: AI014 - Process

Emission Source/Control: AI15A - Process

Emission Source/Control: AI15B - Process

Item 76.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: HMO Source Classification Code: 2-02-002-02
Process Description:
TWO (2) HOMOGENIZING HEAT TREAT FURNACES.
EACH USES MULTIPLE DIRECT FIRE NATURAL GAS
BURNERS. CHEMICAL ADDITIVE PREVENTS
OXIDATION OF SURFACE OF METAL AND PRODUCES
INCIDENTAL HYDROGEN FLUORIDE EMISSIONS AS A
BY-PRODUCT.

Emission Source/Control: AI043 - Process

Emission Source/Control: AI046 - Process

Item 76.3:



This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001

Process: HT1

Source Classification Code: 2-02-002-02

Process Description:

#30, 31, 32, 34, 35, 38 HEAT TREAT FURNACES PROCESS EXHAUST. EACH FURNACE EXHAUSTS THROUGH THEIR OWN EMISSION POINT. #32, 34 AND 35 FURNACES ARE INDIRECTLY FIRED AND HAVE SEPARATE COMBUSTION EXHAUSTS. RESIDUAL OIL ON ALUMINUM PRODUCES SLIGHT VOC EMISSION. CHEMICAL ADDITIVE PREVENTS OXIDATION OF SURFACE OF METAL AND PRODUCES INCIDENTAL HYDROGEN FLUORIDE EMISSION AS A BY-PRODUCT.

Emission Source/Control: AFC1A - Combustion

Emission Source/Control: AFC1C - Combustion

Emission Source/Control: AFC1D - Combustion

Emission Source/Control: AF01A - Process

Emission Source/Control: AF01C - Process

Emission Source/Control: AF01D - Process

Emission Source/Control: AF075 - Process

Emission Source/Control: AF74A - Process

Emission Source/Control: AF74B - Process

Item 76.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001

Process: HT2

Source Classification Code: 2-02-002-02

Process Description:

HEAT TREAT FURNACES #13, #14 AND #15 ARE INDIRECT FIRED NATURAL GAS FURNACES WHERE THE PRODUCTS OF COMBUSTION EXHAUST THROUGH EMISSION POINT (EP) F078A. THE FURNACE IS EXHAUSTED THROUGH EP F0014. HEAT TREAT FURNACES #16, #17 AND #18 HAVE A SIMILAR ARRANGEMENT WHERE THE PRODUCTS OF COMBUSTION EXHAUST THROUGH EP F078B AND THE FURNACE EXHAUST THROUGH EP F0015. FURNACE PROCESS EMISSIONS CONSIST OF RESIDUAL DRAWING LUBE FROM THE BARS WHICH ARE COMBUSTED AND VAPORIZED DURING THE



BEGINNING OF THE HEAT TREAT PROCESS ,
NATURAL GAS AND RESIDUAL OIL ON THE
ALUMINUM PRODUCES SLIGHT VOC EMISSIONS.

Emission Source/Control: AF014 - Process

Emission Source/Control: AF015 - Process

Emission Source/Control: AF02A - Process

Emission Source/Control: AF02B - Process

Emission Source/Control: AF78A - Process

Emission Source/Control: AF78B - Process

Item 76.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00003

Process: FBB

Source Classification Code: 3-04-001-04

Process Description:

In-line filterbox fluxing units use a mixture of argon and chlorine gas to purify molten aluminum as it is being cast into ingots or rod.

Emission Source/Control: M004D - Process

Item 76.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00003

Process: HM1

Source Classification Code: 3-04-022-01

Process Description:

One (1) homogenizer heat treat furnace. It uses multiple direct fire natural gas burners. Chemical additive prevents oxidation of surface of metal and produces incidental hydrogen fluoride emissions as a by-product.

Emission Source/Control: AI047 - Process

Item 76.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00003

Process: MH2

Source Classification Code: 3-04-001-03

Process Description:

Molten aluminum melting and holding furnaces which are permitted to use salt fluxes. All furnaces are reverberatory, center charged. No gas fluxing is done in any furnace.



Emission Source/Control: M004A - Process

Item 76.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-00001
Process: GAS Source Classification Code: 2-02-002-02
Process Description:
FOUR VIRTUALLY IDENTICAL BOILERS CAPABLE
OF BURNING NATURAL GAS.

Emission Source/Control: B0001 - Combustion

Emission Source/Control: B0002 - Combustion

Emission Source/Control: B0003 - Combustion

Emission Source/Control: B0004 - Combustion

Item 76.9:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-00001
Process: OIL Source Classification Code: 1-02-004-01
Process Description:
FOUR VIRTUALLY IDENTICAL BOILERS CAPABLE
OF BURNING No. 6 OIL.

Emission Source/Control: B0001 - Combustion

Emission Source/Control: B0002 - Combustion

Emission Source/Control: B0003 - Combustion

Emission Source/Control: B0004 - Combustion

Item 76.10:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-00001
Process: CD1 Source Classification Code: 3-04-001-09
Process Description:
CHIP DRYER #1 DRIES ALUMINUM MACHINING
CHIPS WITH HEATED AIR.

Emission Source/Control: C029A - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C029B - Control
Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: C0029 - Process



Item 76.11:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-00001
Process: CM1 Source Classification Code: 3-04-001-03
Process Description:
CHIP MELTER #1 MELTS CLEAN ALUMINUM
MACHINING CHIPS.

Emission Source/Control: C0030 - Process

Item 76.12:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-00002
Process: CD2 Source Classification Code: 3-04-001-09
Process Description:
CHIP DRYER #2 DRIES ALUMINUM MACHINING
CHIPS HEATED WITH AIR.

Emission Source/Control: C044A - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: C044B - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: C0044 - Process

Item 76.13:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-00002
Process: CM2 Source Classification Code: 3-04-001-03
Process Description:
CHIP MELTER #2 MELTS CLEAN ALUMINUM
MACHINING CHIPS.

Emission Source/Control: C0045 - Process

Item 76.14:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: D-00001
Process: ALB Source Classification Code: 3-03-001-99
Process Description: ALUMINUM BURNISHER

Emission Source/Control: DFF42 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: DF142 - Process



Item 76.15:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: D-00001
Process: CCT Source Classification Code: 3-03-001-99
Process Description:
EMULSIFIED OIL AND WATER SYSTEM FOR THE
CONTINUOUS CASTER.

Emission Source/Control: DII42 - Process

Item 76.16:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: D-00001
Process: SKD Source Classification Code: 3-04-001-07
Process Description:
FUGITIVES FROM SKIM AND DROSS AREA USED
FOR PASSIVE COOLING OF SKIM AND DROSS.

Emission Source/Control: DI116 - Process

Item 76.17:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00001
Process: FB1 Source Classification Code: 3-03-001-05
Process Description:
FUGITIVES FROM THE BULL BLOCK PROCESS
APPLIES HIGH BOILING POINT (GREATER THAN
300F) SOLVENT TO SLIGHTLY HOT METAL TO
ADHERE METAL TO BLOCK. VOC EMISSIONS ARE
INCLUDED ON THE ANNUAL EMISSIONS
STATEMENT.

Emission Source/Control: FFFB1 - Process

Item 76.18:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00001
Process: FB2 Source Classification Code: 3-03-001-99
Process Description:
FUGITIVES FROM THE INK JET PRINTER. METHYL
ETHYL KETONE (MEK) USED AS A CARRIER
SOLVENT. MEK EMISSIONS ARE INCLUDED ON THE
ANNUAL EMISSIONS STATEMENT.

Emission Source/Control: FFFB2 - Process

Item 76.19:

This permit authorizes the following regulated processes for the cited Emission Unit:



Emission Unit: F-00001
Process: FB3 Source Classification Code: 2-88-888-01
Process Description:
FUGITIVES FROM WAX DIPPING AND AIR DRYING
COILS. WAX IS MIXED WITH WATER AND HEATED,
THUS DOES NOT HAVE A HIGH, VOC CONTENT. VOC
EMISSIONS INCLUDED ON ANNUAL EMISSIONS
STATEMENT.

Emission Source/Control: FFFB3 - Process

Item 76.20:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00001
Process: FC1 Source Classification Code: 2-88-888-01
Process Description:
FUGITIVES FROM THE ROD OILER ASSOCIATED
WITH THE CONTINUOUS CASTER. VOC EMISSIONS
WILL BE INCLUDED ON THE ANNUAL EMISSIONS
STATEMENT.

Emission Source/Control: FIFC1 - Process

Item 76.21:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-00001
Process: FC3 Source Classification Code: 3-03-001-99
Process Description:
TWO (2) MOLD SHOP BAKE OVENS. SMALL OVEN
IS USED TO VOLATILIZE OIL IMPREGNATED IN
GHRAPHITE RINGS. EMISSIONS VENT INTO THE
MILL AND ESTIMATED TO BE INSIGNIFICANT.

Emission Source/Control: FIFC3 - Process

Item 76.22:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: M-00001
Process: MHA Source Classification Code: 3-04-001-99
Process Description:
MOLTEN ALUMINUM MELTING AND HOLDING
FURNACES. CURRENTLY, THESE FURNACES ARE
NOT PERMITTED TO USE SALT FLUXES.

Emission Source/Control: M001C - Process

Emission Source/Control: M001D - Process



Item 76.23:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: M-00001
Process: MHS Source Classification Code: 3-04-001-99
Process Description:
Molten aluminum melting and holding furnaces which are permitted to use salt fluxes. All furnaces are reverberatory, center charged. No gas fluxing is done in any furnace.

- Emission Source/Control: M001A - Process
- Emission Source/Control: M001B - Process
- Emission Source/Control: M0034 - Process
- Emission Source/Control: M0035 - Process
- Emission Source/Control: M003A - Process
- Emission Source/Control: M003C - Process
- Emission Source/Control: M024D - Process
- Emission Source/Control: M024F - Process

Item 76.24:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: M-00002
Process: FBA Source Classification Code: 3-04-001-04
Process Description:
IN-LINE FILTERBOX FLUXING UNITS USE A MIXTURE OF ARGON AND CHLORINE GAS TO PURIFY MOULTEN ALUMINUM AS IT IS BEING CAST INTO INGOTS OR ROD. TYPICALLY THERE IS ONE FILTERBOX PER FURNACE, AND MULTIPLE FURNACES/FILTERBOXES SERVE AS A SINGLE CASTING COMPLEX. WITHIN A CASTING COMPLEX, THESE FILTERBOXES CAN BE EXHAUSTED TOGETHER, INDIVIDUALLY OR NOT AT ALL IN THE CASE OF AN INERTED FILTERBOX. HOWEVER, ONLY ONE FILTERBOX IS FLUXING AT ANY TIME SINCE THERE IS ONLY ONE CASTING APPARATUS PER COMPLEX.

- Emission Source/Control: M001E - Process
- Emission Source/Control: M0036 - Process
- Emission Source/Control: M003E - Process



Emission Source/Control: M005E - Process

Emission Source/Control: M024E - Process

Item 76.25:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-00001

Process: PWS

Source Classification Code: 4-01-003-35

Process Description:

THIS PROCESS CONSISTS OF ALL THE COLD
CLEANING PARTS WASHERS.

Emission Source/Control: PARTS - Process

Item 76.26:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00001

Process: POT

Source Classification Code: 3-03-001-01

Process Description:

ELECTROLYTIC REDUCTION OF ALUMINA INTO
ALUMINUM. THIS POTLINE IS CATEGORIZED AS A
CENTER WORK PREBAKE-1 (CWPB-1) AS DESCRIBED
IN THE DEFINITIONS SECTION OF EPA'S PRIMARY
ALUMINUM MACT REGULATIONS.

Emission Source/Control: SS398 - Control

Control Type: SCRUBBER - DRY ALUMINA INJECTION

Emission Source/Control: SPRV1 - Process

Emission Source/Control: SS198 - Process

Item 76.27:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00002

Process: BAK

Source Classification Code: 3-03-001-05

Process Description:

ANODE BAKING FURNACE AND ASSOCIATED
ALUMINA INJECTION DRY SCRUBBER.

Emission Source/Control: SS78S - Control

Control Type: SCRUBBER - DRY ALUMINA INJECTION

Emission Source/Control: SS078 - Process

Item 76.28:

This permit authorizes the following regulated processes for the cited Emission Unit:

New York State Department of Environmental Conservation
Permit ID: 6-4058-00003/00365 Facility DEC ID: 6405800003



Emission Unit: S-00003
Process: ANC Source Classification Code: 3-85-001-01
Process Description: W354 Anode cooling tower

Emission Source/Control: SS101 - Process

Item 76.29:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00003
Process: GMS Source Classification Code: 3-03-003-99
Process Description:
PASTE PRODUCTION PLANT AND ASSOCIATED COKE
INJECTION SCRUBBER.

Emission Source/Control: SS100 - Control
Control Type: SCRUBBER - DRY COKE INJECTION

Emission Source/Control: SS099 - Process

Item 76.30:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M01 Source Classification Code: 3-03-003-12
Process Description:
BUILDING 332 DUST COLLECTION EQUIPMENT
INCLUDES A STUB HOLE CLEANER WHICH USES AIR
TO BLOW COKE DUST OUT OF STUB HOLES.
PROCESS M01 ALSO INCLUDES TWO SMALL
INDUCTION FURNACES USED FOR MELTING IRON.

Emission Source/Control: SS015 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS016 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS415 - Process

Item 76.31:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M03 Source Classification Code: 3-03-003-12
Process Description: PACKED COKE DRILLED OUT OF ANODE STUB HOLES.

Emission Source/Control: SS095 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS495 - Process

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 76.32:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M04

Source Classification Code: 3-03-001-04

Process Description: DRY SCRUBBER ALUMINUM LOADING AND UNLOADING AREA.

Emission Source/Control: SS090 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS490 - Process

Item 76.33:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M05

Source Classification Code: 3-03-001-05

Process Description: ROUGH CLEANING OF SPENT ANODES.

Emission Source/Control: S23AB - Control

Control Type: FABRIC FILTER

Emission Source/Control: 423AB - Process

Item 76.34:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M06

Source Classification Code: 3-04-022-10

Process Description:

BATH HANDLING, CRUSHING AND CRICIBLE DIGGING OPERATIONS.

Emission Source/Control: SS23A - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS23B - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS23C - Control

Control Type: FABRIC FILTER

Emission Source/Control: 423AA - Process

Emission Source/Control: 423AC - Process

Item 76.35:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M07

Source Classification Code: 3-03-001-04



Process Description:
TRANSFER POINT IN BUILDING 441 FOR TWO
ALUMINA BELT CONVEYORS.

Emission Source/Control: SS041 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS441 - Process

Item 76.36:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M08 Source Classification Code: 3-03-003-12
Process Description: BUTT CRUSHING.

Emission Source/Control: SS038 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS438 - Process

Item 76.37:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M09 Source Classification Code: 3-03-001-05
Process Description:

ANODE BUTT STORAGE, STORAGE FILLING,
AGGREGATE BLENDING, COKE CRUSHING, STORAGE
DISCHARGE, BALL MILL CLASSIFYING, AND
INTERMEDIATE CLASSIFYING.

Emission Source/Control: SS049 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS050 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS051 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS052 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS053 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS060 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS061 - Control
Control Type: FABRIC FILTER



Emission Source/Control: SS449 - Process

Item 76.38:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M10 Source Classification Code: 3-03-001-04
Process Description: STORAGE TANK 440A AND 440B FLUIDIZER FOR ALUMINA.

Emission Source/Control: SS086 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS486 - Process

Item 76.39:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M11 Source Classification Code: 3-03-001-04
Process Description:
TRACK HOPPER DUST COLLECTOR FOR ALUMINA
UNLOADING AND ALUMINA AIRLIFT TOWER DUST
COLLECTOR.

Emission Source/Control: SS092 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS093 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS492 - Process

Item 76.40:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M12 Source Classification Code: 3-03-001-04
Process Description:
TRANSFER POINT 441C SERVES ST441C AND THE
TRANSFER OF ALUMINA TO ST441B.

Emission Source/Control: SS043 - Control
Control Type: FABRIC FILTER

Emission Source/Control: SS443 - Process

Item 76.41:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004
Process: M13 Source Classification Code: 3-03-001-04

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Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Process Description:

ALUMINA TRANSFER POINT 446A FROM REACTORS
TO STORAGE TANKS.

Emission Source/Control: SS046 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS446 - Process

Item 76.42:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M14

Source Classification Code: 3-03-001-04

Process Description:

ALUMINA TRANSFER POINT 446B FROM REACTORS
TO STORAGE TANKS.

Emission Source/Control: SS047 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS447 - Process

Item 76.43:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M15

Source Classification Code: 3-03-001-04

Process Description:

ALUMINA TRANSFER POINT 446C FROM REACTORS
TO STORAGE TANKS.

Emission Source/Control: SS048 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS448 - Process

Item 76.44:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00004

Process: M16

Source Classification Code: 3-03-003-12

Process Description:

POT DIGGING AND SPENT POTLINING HANDLING
OPERATIONS CONTROLLED BY A FABRIC FILTER TO
LIMIT PARTICULATE EMISSIONS TO THE
ENVIRONMENT.

Emission Source/Control: SS102 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SS402 - Process



Item 76.45:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00005
Process: PST Source Classification Code: 3-03-003-12

Process Description:
COAL TAR PITCH INCLUDES A SINGLE EMISSION POINT (EP) SERVING EACH OF TWO COAL TAR PITCH STORAGE TANKS, AND FUGITIVES INCLUDING BUT NOT LIMITED TO THOSE ASSOCIATED WITH THE PITCH RECIRCULATING PUMPS LOCATED IN BUILDING 352F.

Emission Source/Control: SS088 - Process

Emission Source/Control: SS089 - Process

Emission Source/Control: SSFP2 - Process

Item 76.46:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00005
Process: PUN Source Classification Code: 3-03-003-12

Process Description:
COAL TAR PITCH UNLOADING INCLUDES A SINGLE EMISSION POINT (EP) SERVING EACH OF TWO RAILCAR UNLOADING STATIONS, AND FUGITIVES INCLUDING BUT NOT LIMITED TO THOSE ASSOCIATED WITH THE PITCH UNLOADING PUMPS. SOME OF THESE FUGITIVES ARE EXHAUSTED THROUGH THE BU

Emission Source/Control: SS073 - Process

Emission Source/Control: SS077 - Process

Emission Source/Control: SSFP1 - Process

Item 76.47:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00006
Process: FA1 Source Classification Code: 3-03-003-12

Process Description:
TOTAL SUSPENDED SOLID (I.E. PARTICULATE) FUGITIVES FROM COKE UNLOADING.

Emission Source/Control: SSFA1 - Process

Item 76.48:



This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00006
Process: FA2 Source Classification Code: 3-03-003-12
Process Description:
TOTAL SUSPENDED SOLID (I.E. PARTICULATE)
FUGITIVES FROM COKE AND HANDLING.

Emission Source/Control: SSFA2 - Process

Item 76.49:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00006
Process: FA3 Source Classification Code: 3-03-001-05
Process Description:
TOTAL SUSPENDED SOLID (I.E. PARTICULATE)
FUGITIVES FROM CLAMSHELL BUCKET OPERATIONS
IN THE ANODE BAKING FURNACE ROOM.

Emission Source/Control: SSFA3 - Process

Item 76.50:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: S-00006
Process: FAC Source Classification Code: 3-03-001-05
Process Description:
WHEN SPENT ANODES ARE PLACED IN BUILDING
380 AND 376 TO COOL, THERE ARE FUGITIVE
EMISSIONS FROM PASSIVE ANODE COOLING. SOME
HYDROGEN FLUORIDE IS EMITTED AS A RESULT OF
THE RESIDUAL BATH ON THE ANODES. EMISSIONS
ARE INCLUDED ON THE ANNUAL EMISSIONS
STATEMENT

Emission Source/Control: SSFAC - Process

Item 76.51:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: W-00001
Process: WWT Source Classification Code: 3-03-001-99
Process Description:
WASTEWATER TREATMENT CONSISTS OF CHEMICAL
PRE-TREATMENT, AND BIOLOGICAL TREATMENT.

Emission Source/Control: FF069 - Control
Control Type: DUAL ALKALI SCRUBBING

Emission Source/Control: W0069 - Process

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Emission Source/Control: W0070 - Process

Emission Source/Control: W0071 - Process

**Condition 77: Process Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 77.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: C-00001 Process: CD1

CAS No: 0NY075-00-0
Name: PARTICULATES
PTE(s): 0.05 grains per dscf

**Condition 78: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1515(b), Subpart RRR

Item 78.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: A-00003
Process: FBB

Emission Unit: A-00003
Process: MH2

Emission Unit: C-00001

Emission Unit: C-00002

Emission Unit: M-00001

Emission Unit: M-00002

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For existing sources, the notification of compliance



status report is due 60 days after the compliance date established in §63.1501(a). For new affected sources, the report is due within 90 days after conducting the initial performance test required by §63.1511(b), or within 90 days after the compliance date established by §63.1501(b) if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the following information in an operating permit application, in an amendment to a permit application, in a separate submittal, or any combination. The notification of compliance status report must include:

- 1) All information required in §63.9(h) for notification of compliance status reports. The owner/operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
- 2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system)
- 3) Unit labeling as described in §63.1506(b), including process type or furnace classification and operating requirements.
- 4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., the lime injection rate, fabric filter inlet temperature, etc.), including the operating cycle or time period used in the performance test.
- 5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in §63.1506(c).
- 6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in §63.1510(f).
- 7) Manufacturer's specification or analysis documenting the design residence time of no less than 1 second for



each afterburner used to control emissions from a scrap dryer/delacquering kiln/decoating kiln subject to alternative emission standards in §63.1505(e).

8) Manufacturer's specification or analysis documenting the design residence time of no less than 2 seconds and design operating temperature of no less than 1600 degrees F for each afterburner used to control emissions from a sweat furnace that is not subject to a performance test.

9) Approved OM&M plan (Including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device)

10) Startup, shutdown, and malfunction plan, with revisions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 79: Initial Performance Test
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1511(b), Subpart RRR

Item 79.1:

This Condition applies to:

Emission Unit: A00003

Process: MH2

Item 79.1:

This Condition applies to Emission Unit: A-00003

Process: FBB

Item 79.2.3:

Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit, and report the results in the notification of compliance status report as described in 40 CFR Part 63.1515(b). The owner or operator must conduct each performance test according to the requirements of the general provisions in subpart A of this part and this subpart. Owners or operators of affected sources located at facilities which are area sources are subject only to those performance testing requirements pertaining to D/F. Owners or operators of sweat furnaces meeting the specifications of 40 CFR Part 63.1505(f)(1) are not required to conduct a performance test.

(1) The owner or operator 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.

(2) 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.

(3) 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.

(4) 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.

(5) Initial 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.

**Condition 80: Equations for determining compliance - PM, HCl and D/F emission limits.
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1513(b), Subpart RRR

Item 80.1:

This Condition applies to:

Emission Unit: A00003
Process: MH2

Emission Unit: M00001

Emission Unit: M00002

Item 80.1:

This Condition applies to Emission Unit: A-00003
Process: FBB

Item 80.2.3:

(1) Use equation 7 to determine compliance with an emission limit for PM or HCl:

$$E = \frac{C \times Q \times K_1}{P} \quad (\text{Eq. 7})$$



Where,

E = Emission rate of PM or HCl, kg/Mg (lb/ton) of feed;
C = Concentration of PM or HCl, g/dscm (gr/dscf);
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);
K₁ = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and
P = Production rate, Mg/hr (ton/hr).

(2) Use equations 7A of this section to determine compliance with an emission limit for D/F:

$$E = \frac{C \times Q}{P} \quad (\text{Eq. 7A})$$

Where,

E = Emission rate of D/F, ug/Mg (gr/ton) of feed;
C = Concentration of D/F, ug/dscm (gr/dscf);
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);
P = Production rate, Mg/hr (ton/hr).

Condition 81: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00003
Process: MH2

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 81.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The particulate matter (PM) emissions from this emission unit, are subject to the Federal National Emission Standards for Hazardous Air Pollutants in 40 CFR part 63 Subpart RRR, which satisfy the requirements of Part 212.5(d) for PM emissions as long as the source owner continues to demonstrate that the emission unit is in compliance with the respective Federal requirements



contained in this permit. Compliance testing shall be conducted upon request from the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 82: Establishment of Monitoring and Operating Parameter Values Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1511(g), Subpart RRR

Item 82.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: C00001

Emission Unit: C00002

Emission Unit: M00001

Emission Unit: M00002

Item 82.1:

This Condition applies to Emission Unit: A-00003
Process: MH2

Item 82.2.3:

Establishment of monitoring and operating parameter values. The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR Part 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by 40 CFR Part 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:

- (1) The complete emission test report(s) used as the basis of the parameter(s) is submitted.
- (2) The same test methods and procedures as required by this subpart were used in the test.
- (3) The owner or operator certifies that no design or work practice changes have



been made to the source, process, or emission control equipment since the time of the report.

(4) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

Condition 83: Corrective Action
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 227-1.6

Item 83.1:

This Condition applies to Emission Unit: B-00001

Item 83.2:

(a) Any person found to have violated any provision of this Part shall not cause, permit or allow operation of the stationary combustion installation involved in the violation unless:

- (1) it is equipped with approved emission control equipment;
- (2) it is rehabilitated or upgraded in an approved manner; or
- (3) the fuel is changed to an acceptable type.

(b) The commissioner may seal such stationary combustion installation so as to prevent any operation if the conditions of paragraph (a)(1)-(3) above are not met within the time provided by the order of final determination issued in the case of the violation.

(c) No person shall cause, permit or allow operation of any stationary combustion installation sealed by the commissioner in accordance with this section.

(d) No person except the commissioner or his representative shall remove, tamper with or destroy any seal affixed to any stationary combustion installation.

Condition 84: General Provisions
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 227-1.7

Item 84.1:

This Condition applies to Emission Unit: B-00001

Item 84.2:

(a) Emission data. Any person who owns or operates a stationary combustion installation described in 6 NYCRR Part 227-1 shall provide pertinent data concerning emissions when so requested by the commissioner.

(b) Test methods. Sampling, compositing and analysis of fuel samples shall be carried

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out in accordance with the most recent ASTM standard methods or equivalent methods acceptable to the commissioner.

Condition 85: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 249.3 (a)

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

Item 85.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The current emission source configuration is considered BART for emissions of PM-10. The current emissions of 0.10 lbs PM-10/MMBtu is the emission limit. Testing shall be completed once during the term of the permit.

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 201A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 86: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 249.3 (a)

Item 86.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 86.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The current emission source configuration is considered BART for emissions of Oxides of Nitrogen. The current emission limit of 0.30 lbs NO_x/MMBtu is the emission limit. Testing shall be completed under an approved protocol once during the term of the permit.

Upper Permit Limit: 0.30 pounds per million Btus

Reference Test Method: EPA RM 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 87: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 225-1.2 (d)

Item 87.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: OIL

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 87.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Sulfur content of Number 6 fuel oil used in this process shall not exceed 1.5% by weight.

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 88: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:6 NYCRR 225-1.7 (c)

Item 88.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001
Process: OIL

Item 88.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must make daily measurements of the rate of each fuel burned. Also, the facility must measure the gross heat content and ash content of each fuel burned at least once per week. This information must be retained by the source owner for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 89: Records retention
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 225-1.7 (d)

Item 89.1:

This Condition applies to Emission Unit: B-00001
Process: OIL

Item 89.2:

Data collected pursuant to 6 NYCRR Part 225-1.7 must be tabulated and summarized in a form acceptable to the commissioner, and must be retained for at least three years. The source owner must furnish such records and summaries upon request of the commissioner.

**Condition 90: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 225-1.7 (e)

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001
Process: OIL

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 90.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Source owners subject to this section must submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, or if measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such excesses if known, for the calendar quarter.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 91: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 225-1.8 (a)

Item 91.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: OIL

Item 91.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall retain fuel oil supplier certifications for each shipment of oil received. Such certifications shall contain, as a minimum: supplier name, date of shipment, quantity shipped, oil sulfur content, and the method used to determine the sulfur content. Such certifications shall be available for inspection by, or submittal to, NYSDEC upon request.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 92: Sampling, compositing, and analysis of fuel samples
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 225-1.8 (d)

Item 92.1:

This Condition applies to Emission Unit: B-00001

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Process: OIL

Item 92.2:

All sampling, compositing, and analysis of fuel samples, taken to determine compliance with 6 NYCRR Part 225-1, must be done in accordance with methods acceptable to the commissioner.

**Condition 93: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 93.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001
Process: OIL

Item 93.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average utilizing a continuous opacity monitor (COM).

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9

Monitoring Frequency: CONTINUOUS

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 94: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 227-1.4 (b)

Item 94.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001
Process: OIL

Item 94.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation which utilizes a continuous opacity monitoring system (COMS) shall include the following in their quarterly excess emission reports:

- 1) Magnitude, date, and time of each exceedence;
- 2) For each period of excess emissions, specific identification of the cause and corrective action taken;
- 3) Date, time, and duration of each period of COMS downtime, and the corrective action for each period of downtime;
- 4) Total time the COMS is required to record data during the reporting period;
- 5) The total number of exceedences and the duration of exceedences expressed as a percentage of the total time in which the COMS are required to record data; and
- 6) Such other requirements as the Department may deem necessary in order to enforce Article 19 of the Environmental Conservation Law (ECL).

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 95: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 249.3 (a)

Item 95.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-00001

Process: OIL

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 95.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The current limit of 1.5% sulfur by weight fuel oil is considered the BART limit. Fuel supplier certifications shall be used to certify the sulfur level for each delivery.

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 96: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)

Item 96.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 96.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This emission rate of volatile organic compounds (VOC) from this emission unit shall not exceed 9.1 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 9.1 pounds per hour

Reference Test Method: METHOD 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 97: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 97.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 97.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This emission rate of oxides of nitrogen (NO_x) from this emission unit shall not exceed 9.1 pounds per hour.

Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 9.1 pounds per hour

Reference Test Method: METHOD 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 98: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 52.21(i)(1), Subpart A

Item 98.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 98.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate of particulate matter (PM) from this emission unit shall not exceed 5.6 pounds per hour.

Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 5.6 pounds per hour

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 99: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.9 (b)

Item 99.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001
Process: CD1

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 99.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In the event any of the characteristics of the uniform scrap being processed at the plant changes that will result in an increase in emissions above permitted levels of any regulated contaminant, a proper permit application shall be submitted as necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 100: Conversion of D/F measurements to TEQ units
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1513(d), Subpart RRR

Item 100.1:

This Condition applies to:

Emission Unit: C00001
Process: CD1

Emission Unit: C00002
Process: CD2

Item 100.1:

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



This Condition applies to Emission Unit: C-00001
Process: CM1

Item 100.2.3:

To convert D/F measurements to TEQ units, the owner/operator must use the procedures and equations in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), incorporated by reference in §63.1502 of Subpart RRR, available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, VA, NTIS no. PB 90-145756.

Condition 101: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 101.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001 Emission Point: I0029
Process: CD1

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 101.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) sulfur dioxide (SO₂) has been issued an environmental rating of B. The emission rate potential of sulfur dioxide from this process shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10 pounds per hour

Reference Test Method: EPA RM 6C

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 102: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 102.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Emission Unit: C-00001
Process: CD1

Emission Point: I0029

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 102.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Carbon Monoxide (CO) emissions from the facility were given an environmental rating of "C". Measured emissions at emission point I0029 (#1 Chip Dryer) were 13.3 pounds per hour which requires 70% control or Best Available Control Technology (BACT). Facility has previously submitted the requisite BACT analysis and current operation is considered BACT for CO emissions from #1 Chip Dryer. Upon request from the Department facility shall reevaluate BACT for CO emissions associated with the #1 Chip Dryer.

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 13.3 pounds per hour

Reference Test Method: EPA METHOD 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 103: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 103.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00001
Process: CM1

Emission Point: I0030
Emission Source: C0030

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 103.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The NOx RACT compliance plan submitted to NYSDEC in 1994

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



determined control of NO_x was not technically or economically feasible at that time. The current equipment configuration meets NO_x RACT. Facility must perform an updated NO_x RACT determination prior to rebuilding the unit.

Reference Test Method: EPA RM 7E

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 104: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)

Item 104.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 104.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate of nitrogen oxides (NO_x) from this emission unit shall not exceed 9.1 pounds per hour.

Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 9.1 pounds per hour

Reference Test Method: METHOD 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 105: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 231-2.2 (d) (3)

Item 105.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



CAS No: 0NY998-00-0 VOC

Item 105.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate of volatile organic compounds (VOC) from this emission unit shall not exceed 9.1 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 9.1 pounds per hour

Reference Test Method: METHOD 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 106: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 52.21(i)(1), Subpart A

Item 106.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 106.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate of particulate matter (PM) from this emission unit shall not exceed 3.4 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 3.4 pounds per hour

Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 107: Compliance Certification



Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 107.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002
Process: CD2

Regulated Contaminant(s):
CAS No: 000111-42-2 ETHANOL, 2,2'-IMINOBIS-

Item 107.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) diethanolamine has been issued an environmental rating of B. The emission rate potential of diethanolamine from each emission source in this process shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 108: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 108.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002
Process: CD2

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 108.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



As required by 6 NYCRR Part 212.4(a) sulfur dioxide (SO₂) has been issued an environmental rating of B. The emission rate potential of sulfur dioxide from each emission source in this process shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 6C

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 109: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 109.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-00002

Process: CD2

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 109.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) carbon monoxide (CO) has been issued an environmental rating of C. The emission rate potential of carbon monoxide from each emission source in this process shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 110: RACT analysis not required for emission points less than 3 lb/hr VOC or NO_x
Effective for entire length of Permit



Applicable Federal Requirement:6 NYCRR 212.10 (c) (1)

Item 110.1:

This Condition applies to Emission Unit: F-00001

Item 110.2:

A reasonably available control technology (RACT) analysis is not required for emission points with nitrogen oxide and volatile organic compound emission rate potentials less than 3.0 pounds per hour at facilities located outside of the lower Orange County and New York City metropolitan areas.

**Condition 111: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212.10 (c) (1)

Item 111.1:

The Compliance Certification activity will be performed for:

Emission Unit: F-00001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 111.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission rate potential of volatile organic compound (VOC) from each emission source in this emission unit shall remain less than 3.0 pounds per hour. A reasonably available control technology (RACT) analysis is not required for emission sources with VOC emission rate potentials less than 3.0 pounds per hour at facilities located outside of the Lower Orange County and New York City metropolitan areas.

Reference Test Method: EPA RM 18 or 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 112: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212.4 (a)

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 112.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Regulated Contaminant(s):
CAS No: 007782-50-5 CHLORINE

Item 112.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) chlorine has been issued an environmental rating of B. The emission rate potential of chlorine from each emission source in this emission unit shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 113: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 113.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 113.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The particulate matter (PM) emissions from this emission unit, are subject to the Federal National Emission Standards for Hazardous Air Pollutants in 40 CFR part 63 Subpart RRR, which satisfy the requirements of Part 212.5(d) for PM emissions as long as the source owner continues to demonstrate that the emission unit is in compliance with the respective Federal requirements



contained in this permit. Compliance testing shall be conducted upon request from the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 114: Testing of Representative Emission Units
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1511(f), Subpart RRR

Item 114.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: A00003
Process: MH2

Emission Unit: M00002

Item 114.1:

This Condition applies to Emission Unit: M-00001

Item 114.2.3:

With the prior approval of the permitting authority, an owner or operator may utilize emission rates obtained by testing a particular type of group 1 furnace which is not controlled by any add-on control device, or by testing an in-line flux box which is not controlled by any add-on control device, to determine the emission rate for other units of the same type at the same facility. Such emission test results may only be considered to be representative of other units if all of the following criteria are satisfied:

- (1) The tested emission unit must use feed materials and charge rates which are comparable to the emission units that it represents;
- (2) The tested emission unit must use the same type of flux materials in the same proportions as the emission units it represents;
- (3) The tested emission unit must be operated utilizing the same work practices as the emission units that it represents;
- (4) The tested emission unit must be of the same design as the emission units that it represents; and
- (5) The tested emission unit must be tested under the highest load or capacity reasonably expected to occur for any of the emission units that it represents.



**Condition 115: Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1512(k), Subpart RRR

Item 115.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB

Emission Unit: A00003
Process: MH2

Emission Unit: C00001

Emission Unit: C00002

Emission Unit: M00002

Item 115.1:

This Condition applies to Emission Unit: M-00001

Item 115.2.3:

Feed/charge weight measurement. During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.

**Condition 116: Equation to Calculate SAPU HCl emissions
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1513(e), Subpart RRR

Item 116.1:

This Condition applies to:

Emission Unit: A00003
Process: FBB



Emission Unit: A00003
 Process: MH2

Emission Unit: M00002

Item 116.1:

This Condition applies to Emission Unit: M-00001

Item 116.2.3:

Use the equation below to compute the aluminum mass-weighted HCl emissions for the secondary aluminum processing unit. Compliance is achieved if the mass weighted emissions for the secondary aluminum processing unit (E_{cHCl}) is less than or equal to the emission limit for the secondary aluminum processing unit (L_{cHCl}) calculated using equation 2 in §63.1505(k).

$$E_{cHCl} = \frac{\sum_{i=1}^n (E_{iHCl} \times T_{ii})}{\sum_{i=1}^n T_{ii}}$$

Where,

E_{cHCl} = The mass weighted HCl emissions for the secondary aluminum processing unit;
 and

E_{iHCl} = Measured HCl emissions for the individual emissions unit i.

T_{ii} = The average feed rate (production 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 processing unit.

Condition 117: Equation to show compliance with SAPU particulate emission limit

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1513(e), Subpart RRR

Item 117.1:

This Condition applies to:

Emission Unit: A00003
 Process: FBB

Emission Unit: A00003



Process: MH2

Emission Unit: M00002

Item 117.1:

This Condition applies to Emission Unit: M-00001

Item 117.2.3:

Use the procedure below to determine compliance with emission limits for a secondary aluminum processing unit.

(1) Use the equation below to compute the mass-weighted PM emissions for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit E_{CPM} is less than or equal to the emission limit for the secondary aluminum processing unit L_{CPM} calculated using Equation 1 in 40 CFR Part 63.1505(k).

$$E_{CPM} = \frac{\sum_{i=1}^n (E_{tiPM} \times T_{ti})}{\sum_{i=1}^n (T_{ti})}$$

Where,

E_{CPM} = The mass-weighted PM emissions for the secondary aluminum processing unit;

E_{tiPM} = Measured PM emissions for individual emission unit i;

T_{ti} = The average feed rate (production 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 processing unit.

**Condition 118: Compliance demonstration requirements for Group 1 Furnaces without add on control devices
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1512(e), Subpart RRR

Item 118.1:

This Condition applies to:

Emission Unit: A00003

Process: MH2

Item 118.1:

This Condition applies to Emission Unit: M-00001

Process: MHS

Item 118.2.3:



(e) *Group 1 furnace (including melting holding furnaces) without add-on air pollution control devices.* In the site-specific monitoring plan required by Sec. 63.1510(o), the owner or operator of a group 1 furnace (including a melting/holding furnaces) without add-on air pollution control devices must include data and information demonstrating compliance with the applicable emission limits.

(1) If the group 1 furnace processes other than clean charge material, the owner or operator must conduct emission tests to measure emissions of PM, HCl, and D/F at the furnace exhaust outlet.

(2) If the group 1 furnace processes only clean charge, the owner or operator must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the group 1 furnace (including a melting/holding furnace) processes only clean charge.

(3) The owner or operator may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.

**Condition 119: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 231-11.2 (b)

Item 119.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Process: MHS

Emission Source: M003A

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 119.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As a result of the modification to #14 ingot furnace (Emission Source: M003A), the owner or operator must determine whether a significant net emissions increase has occurred as a result of the furnace modification. Such determination must present the actual baseline emissions and the actual emissions after the furnace modification.

Emissions of NOx, PM-10, PM-2.5, VOC, CO, and CO2(e) must be computed for each 12 month rolling period commencing the 12th month after first modifying the #14 ingot furnace and ending with the completion of the fifth annual period after modification of the #14 ingot furnace.



On an annual basis, the owner or operator shall submit to the Department a statement whether the owner or operator has completed the analysis. If the analysis shows that the modification has resulted in a significant net emissions increase for either NO_x, PM-10, PM-2.5, VOC, CO, or CO₂(e), the owner or operator must submit to the Department, within 30 days of such showing, a report of such calculation.

The facility owner or operator, in addition to complying with the requirements above and any requirements under Part 201 of this Title, must maintain the following information for a minimum of five years:

- (1) a description of the modification;
- (2) an identification of each new or modified emission source(s) including the associated processes and emission unit and including any exempt emission sources that were part of the project;
- (3) the calculation of the project emission potential for each modified emission source(s) (including exempt emission sources) including supporting documentation; and
- (4) the date the modification commenced operation.

These recordkeeping requirements apply to exempt and trivial activities but do not affect their exempt or trivial permitting status under Subpart 201-3 of this Title.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 120: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1505(i), Subpart RRR

Item 120.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Process: MHS

Emission Source: M003A

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



CAS No: 0NY075-00-0 PARTICULATES

Item 120.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This group 1 furnace is considered a new secondary aluminum processing unit (SAPU) and will demonstrate compliance with the particulate matter (PM) emission limit of 0.4 pounds of PM per ton of feed/charge.

Owner will conduct an initial performance test of PM emissions from #14 ingot furnace within 180 days of completion of furnace modifications. Subsequent performance tests of PM emissions will be performed once every five years.

Compliance with this PM emission limit shall be deemed compliance with the PM emission limit contained in 6 NYCRR Part 212.4(c) since the PM emission limit in 6 NYCRR Part 212.4(c) is less restrictive than the PM emission limit contained in 40 CFR 63.1505(i).

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.40 pounds per ton

Reference Test Method: EPA RM 5

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 121: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1505(i), Subpart RRR

Item 121.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Process: MHS

Emission Source: M003A

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

Item 121.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This group 1 furnace is considered a new secondary

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aluminum processing unit (SAPU) and will demonstrate compliance with the hydrogen chloride (HCl) emission limit of 0.4 pounds of HCl per ton of feed/charge.

Owner will conduct an initial performance test of HCl emissions from #14 ingot furnace within 180 days of completion of furnace modifications. Subsequent performance tests of HCl emissions will be performed once every five years.

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 0.40 pounds per ton

Reference Test Method: EPA RM 26A

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 122: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(i), Subpart RRR

Item 122.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00001

Process: MHS

Emission Source: M003A

Regulated Contaminant(s):

CAS No: 001746-01-6

2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 122.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This group 1 furnace is considered a new secondary aluminum processing unit (SAPU) and will demonstrate compliance with the dioxins and furans (D/F) emission limit of 15 micrograms of D/F TEQ per megagram of feed/charge.

Owner will conduct an initial performance test of D/F emissions from #14 ingot furnace within 180 days of completion of furnace modifications. Subsequent performance tests of D/F emissions will be performed once every five years.

Parameter Monitored: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Upper Permit Limit: 15 micrograms of D/F TEQ per Mg

Reference Test Method: EPA RM 23

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Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 123: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 123.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00002

Regulated Contaminant(s):
CAS No: 007782-50-5 CHLORINE

Item 123.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) chlorine has been issued an environmental rating of B. The emission rate potential of chlorine from each emission source in this emission unit shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 124: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.5 (d)

Item 124.1:

The Compliance Certification activity will be performed for:

Emission Unit: M-00002

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 124.2:

Compliance Certification shall include the following monitoring:

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Facility DEC ID: 6405800003



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The particulate matter (PM) emissions from this emission unit, are subject to the Federal National Emission Standards for Hazardous Air Pollutants in 40 CFR part 63 Subpart RRR, which satisfy the requirements of Part 212.5(d) for PM emissions as long as the source owner continues to demonstrate that the emission unit is in compliance with the respective Federal requirements contained in this permit. Compliance testing shall be conducted upon request from the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 125: SAPU emission limits for individual emission units
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1505(k)(4), Subpart RRR

Item 125.1:

This Condition applies to:

Emission Unit: A00003

Emission Unit: M00001

Item 125.1:

This Condition applies to Emission Unit: M-00002

Item 125.2.3:

The owner/operator of a secondary aluminum processing unit (SAPU) at a secondary aluminum production facility that is a major source may demonstrate compliance with the emission limits of §63.1505(k)(1)-(3) by demonstrating that each emission unit with the SAPU is in compliance with the applicable emission limits of §63.1505(i) and 1505(j).

**Condition 126: Flux Injection Rate compliance demonstration requirements
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1512(o), Subpart RRR

Item 126.1:

This Condition applies to:

Emission Unit: A00003

Process: FBB



Item 126.1:

This Condition applies to Emission Unit: M-00002

Item 126.2.3:

Flux injection rate. The owner or operator must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.

(1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;

(2) Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;

(3) Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using Equation 5:

$$Wt = F1W1 + F2W2$$

Where,

Wt = Total chlorine usage, by weight;

F1 = Fraction of gaseous or liquid flux that is chlorine;

W1 = Weight of reactive flux gas injected;

F2 = Fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride; and

W2 = Weight of solid reactive flux;

(4) Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and

(5) If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by the applicable permitting authority.

**Condition 127: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1512(r), Subpart RRR

Item 127.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00003

Process: FBB

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP



Item 127.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, and in-line fluxer must submit the information described in §63.1515(b)(3) as part of the notification of compliance status report to document conformance with the labeling standards listed in §63.1506(b).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 128: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Part 226

Item 128.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-00001

Process: PWS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 128.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.



B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).
- (8) Include in the semiannual monitoring report and annual compliance certifications (required of all permittees subject to Title V) the solvent consumption for the reporting period required under (5) above, as well as a statement that the permittee's obligations under items (1) through (7) above have been met for the period of the report or certification.. This statement must be based on the permittees observations on a weekly basis that the operation of the solvent metal cleaning process has met



the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 129: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.9 (d)

Item 129.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 129.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following equation shall be used monthly to determine permissible solid particulate emissions (based on process weight) for sources up to 100,000 lb/hr:

$$E = 0.024P^{(0.67)};$$

where:

E - is the permissible emission rate, and
P - is process weight in lb/hr.

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 130: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 249.3 (a)

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Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 130.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001

Process: POT

Regulated Contaminant(s):

CAS No: ONY075-00-5 PM-10

Item 130.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The current emission source configuration is considered BART for emissions of PM-10. The current emissions of 168 tons per year is the emission limit effective January 1, 2014. Testing shall be completed under an approved protocol within 6 months after the emission limit effective date above. Emission factors established during the stack test shall be used to calculate emissions on an annual basis rolled monthly. Monitoring of the control device is accomplished through the monitoring conditions required under the primary aluminum MACT and satisfy CAM requirements.

Upper Permit Limit: 168 tons per year

Reference Test Method: EPA Method 201A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 131: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 249.3 (a)

Item 131.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001

Process: POT

Regulated Contaminant(s):

CAS No: ONY210-00-0 OXIDES OF NITROGEN

Item 131.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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Monitoring Description:

The current emission source configuration is considered BART for emissions of Oxides of Nitrogen. The current emissions of 50 tons per year is the emission limit effective January 1, 2014. Testing shall be completed under an approved protocol within 6 months after the emission limit effective date above. Emission factors established during the stack test shall be used to calculate emissions on an annual basis rolled monthly.

Upper Permit Limit: 50 tons per year

Reference Test Method: EPA RM 7E

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 132: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.843(a)(1)(i), Subpart LL

Item 132.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001

Process: POT

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 132.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall not discharge or cause to be discharged into the atmosphere any emissions of Total Fluorides (TF) in excess of the applicable limit below:

- 1.9 lb/ton of aluminum produced for each CWPB1 potline;

Reference Test Method: EPA Method 13B or ALT

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).



Condition 133: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.847(d)(1), Subpart LL

Item 133.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001

Process: POT

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 133.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The initial performance test and all subsequent performance tests shall be conducted in accordance with the requirements of the general provisions in 40 CFR Part 63 Subpart A, the approved test plan, and the procedures in 40 CFR Part 63.847. For each potline, the owner or operator shall measure and record the emission rate of total fluorides (TF) exiting the outlet of the primary control system for each potline and the rate of secondary emissions exiting through each roof monitor.

Using the equation in 40 CFR Part 63.847(e)(1), the owner or operator shall compute and record the average of at least three runs each month for secondary emissions and at least three runs each year for the primary control system to determine compliance with the applicable emission limit. Compliance is demonstrated when the emission rate of TF is equal to or less than the applicable emission limit in 40 CFR Part 63.843(a)(1).

Parameter Monitored: FLUORIDES

Upper Permit Limit: 1.9 pounds per ton

Reference Test Method: EPA RM 13B OR ALT

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 134: Performance Test Requirements - Previous Control Device Tests
Effective for entire length of Permit



Applicable Federal Requirement:40CFR 63.847(d)(3), Subpart LL

Item 134.1:

This Condition applies to:

Emission Unit: S00001
Process: POT

Emission Unit: S00002
Process: BAK

Item 134.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 134.2.3:

If the owner or operator has performed more than one test of total fluoride (TF) and polycyclic organic compound (POM) primary emissions from a potline or bake furnace control device(s) during the previous consecutive 12 months, the average of all runs performed in the previous 12-month period shall be used to determine the contribution from the primary emission control system.

**Condition 135: Potline TF emission rate calculation
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(e)(1), Subpart LL

Item 135.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 135.2:

The owner/operator shall determine compliance with the applicable TF emission limits by computing the emission rate (E_p) of TF from each potline using the following equation (Equation 1):

$$E_p = [(C_{s1} \times Q_{sd})_1 + (C_{s2} \times Q_{sd})_2] / (P \times K)$$

Where:

E_p = emission rate of TF from a potline, kg/Mg (lb/ton);

C_{s1} = concentration of TF from the primary control system, mg/dscm (mg/dscf);

Q_{sd} = volumetric flowrate of effluent gas corresponding to the appropriate subscript location, dscm/hr (dscf/min);

C_{s2} = concentration of TF as measured for roof monitor emissions, mg/dscm (mg/dscf);

P = aluminum production rate Mg/hr (ton/hr);



K=conversion factor, 106 mg/kg (453,600 mg/lb);

γ_1 = subscript for primary control system effluent gas; and

γ_2 =subscript for secondary control system or roof monitor effluent gas

**Condition 136: Procedure to determine weights
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(e)(5), Subpart LL

Item 136.1:

This Condition applies to:

Emission Unit: S00001
Process: POT

Emission Unit: S00002
Process: BAK

Item 136.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 136.2.3:

The owner/operator shall determine compliance with the applicable TF and POM emission limits by determining the weight of the aluminum tapped from the potline and the weight of the green anode material placed in the anode bake furnace using the monitoring devices required in §63.848(j).

**Condition 137: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(e)(6), Subpart LL

Item 137.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Item 137.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall determine compliance with the applicable total fluoride (TF) and polycyclic organic compound (POM) emission limits by determining the aluminum production rate (P). This shall be done by dividing the number of hours in the calendar month into the weight of

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aluminum tapped from the potline during the calendar month that includes the three runs of a performance test.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 138: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(h)(1), Subpart LL

Item 138.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 068188-85-2 FLUORIDES

Item 138.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall ensure that the alumina flow to each of the A398 dry alumina scrubbers (emission control SS398) remains greater than or equal to the level set in the latest Department approved Control Device Monitoring Plan for the 36 hour potroom cycle.

Monitoring Frequency: HOURLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 139: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(h)(1), Subpart LL

Item 139.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 068188-85-2 FLUORIDES

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Item 139.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall ensure that the air flow to each of the A398 dry alumina scrubbers (emission control SS398) remains greater than or equal to the level set in the latest Department approved Control Device Monitoring Plan for the 36 hour potroom cycle.

Monitoring Frequency: HOURLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 140: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(h)(3), Subpart LL

Item 140.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001

Process: POT

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 140.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall determine the operating limits and monitoring frequency for each control device that is to be monitored as required in §63.848(f). The owner/operator may redetermine the upper and/or lower operating limits, as appropriate, based on historical data or other information and submit an application to the Department to change the applicable limit(s). The redetermined limits shall become effective upon approval of an updated Control Device Monitoring Plan (CDMP) by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 141: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:40CFR 63.848(a), Subpart LL

Item 141.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 068188-85-2 FLUORIDES

Item 141.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Using the procedures in 40 CFR 63.847 and in the approved test plan, the owner/operator shall monitor emissions of total fluorides (TF) from each potline by conducting monthly performance tests. The owner/operator shall compute and record the monthly average from at least three runs for secondary emissions and the previous 12-month average of all runs for the primary control system to determine compliance with the applicable emission limit. The owner/operator must include all valid runs in the monthly average. The duration of each run for secondary emission must represent a complete operating cycle.

Parameter Monitored: FLUORIDES
Upper Permit Limit: 1.9 pounds per ton
Reference Test Method: EPA RM 13B OR ALT
Monitoring Frequency: MONTHLY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

**Condition 142: Reduced sampling frequency - contents of request letter
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(e)(1), Subpart LL

Item 142.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 142.2:

The owner/operator may submit a written request to the New York State DEC to establish an alternative testing requirement to reduce the sampling of secondary TF emissions from potlines from monthly to quarterly. In the request, the owner/operator shall provide



information and data demonstrating, to the satisfaction of the New York State DEC, that secondary emissions of TF from potlines have low variability during normal operations using the following procedures:

- 1) Submit data from 24 consecutive months of sampling that show the average TF emissions are less than 60 percent of the applicable limit and that no monthly performance test in the 24 months of sampling exceeds 75% of the applicable limit; or
- 2) Submit data and a statistical analysis that the New York State DEC may evaluate based on the approach used in "Primary Aluminum: Statistical Analysis of Potline Fluoride Emissions and Alternative Sampling Frequency" (EPA-450-86-012, October 1986).

**Condition 143: Reduced sampling frequency request - contents of the approved alternative requirement
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(e)(2), Subpart LL

Item 143.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 143.2:

The owner/operator may submit a written request to the New York State DEC to establish an alternative testing requirement to reduce the sampling of secondary TF emissions from potlines from monthly to quarterly.

An approved alternative requirement must include a test schedule and the method to be used to measure emissions for performance tests.

**Condition 144: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(f)(1), Subpart LL

Item 144.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 068188-85-2 FLUORIDES

Item 144.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall install, operate, calibrate, and maintain a continuous parameter monitoring system for each



emission control device. The owner/operator shall submit for approval by the New York State DEC a description of the parameter(s) to be monitored, the operating limits, and the monitoring frequency to ensure that the control device is being properly operated and maintained. An explanation of the criteria used for selection of the parameter(s), the operating limits, and the monitoring frequency, including how these relate to emission control also shall be submitted to the New York State DEC. Except as provided in 40 CFR 63.848(l), for dry alumina scrubbers, a device for the measurement of air flow shall be installed, monitored and recorded in accordance with the parametric monitoring plan.

Reference Test Method: 4075-TF

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 145: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.848(g), Subpart LL

Item 145.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: S-00001

Process: POT

Emission Unit: S-00002

Process: BAK

Emission Unit: S-00003

Process: GMS

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 145.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall visually inspect the exhaust stack(s) of each control device on a daily basis for evidence of any visible emissions indicating abnormal operation.



Item 147.2.3:

If the limit for a given operating parameter associated with monitoring a specific control device is exceeded six times in any semiannual reporting period, then any subsequent exceedance in that reporting period is a violation. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed in any given 24-hour period.

**Condition 148: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(j), Subpart LL

Item 148.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 148.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of a new or existing potline or anode bake furnace shall install, operate, and maintain a monitoring device to determine the daily weight of aluminum produced.

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 149: Accuracy and calibration requirements
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(k), Subpart LL

Item 149.1:

This Condition applies to:

Emission Unit: S00002
Process: BAK

Emission Unit: S00003
Process: GMS



Item 149.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 149.2.3:

The owner/operator shall submit recommended accuracy requirement to the New York State DEC for review and approval. All monitoring devices required by §63.848 must be certified by the owner/operator to meet the accuracy requirements and must be calibrated in accordance with the manufacturer's instructions.

**Condition 150: Alternative operating parameters
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(l), Subpart LL

Item 150.1:

This Condition applies to:

Emission Unit: S00002
Process: BAK

Emission Unit: S00003
Process: GMS

Item 150.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 150.2.3:

The owner/operator may monitor alternative control device operating parameters subject to prior written approval by the New York State DEC.

**Condition 151: Definition of potline in Method 14
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.849(c), Subpart LL

Item 151.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 151.2:

Except as provided in §63.845(g)(1), references to "potroom" or "potroom group" in Method 14 in appendix A to part 60 shall be interpreted as "potline" for the purposes of subpart LL.

**Condition 152: Installation of manifolds for potlines subject to Method
14**

Effective for entire length of Permit



Applicable Federal Requirement:40CFR 63.849(d), Subpart LL

Item 152.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 152.2:

For sampling using Method 14 in Appendix A to part 60, the owner/operator shall install one Method 14 manifold per potline in a potroom that is representative of the entire potline, and this manifold shall meet the installation requirements specified in section 2.2.1 of Method 14 in appendix A to part 60.

Condition 153: Performance test reports
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(b), Subpart LL

Item 153.1:

This Condition applies to:

Emission Unit: S00002
Process: BAK

Emission Unit: S00003
Process: GMS

Item 153.1:

This Condition applies to Emission Unit: S-00001
Process: POT

Item 153.2.3:

The owner/operator shall report the results of the initial performance test as part of the notification of compliance status required in §63.850(a)(6). Except as provided in §63.850(d), the owner/operator shall submit a summary of all subsequent performance tests to the New York State DEC on an semi-annual basis.

Condition 154: Startup, shutdown, and malfunction plan and reports
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(c)(1), Subpart LL

Item 154.1:

This Condition applies to:

Emission Unit: S00002
Process: BAK

Emission Unit: S00003

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Process: GMS

Item 154.1:

This Condition applies to Emission Unit: S-00001

Process: POT

Item 154.2.3:

The owner/operator shall develop a written plan as described in §63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the standard. The plan does not have to be submitted with the permit application or included in the operating permit. The New York State DEC may review the plan upon request. In addition to the information required in §63.6(e)(3), the plan shall include procedures, including corrective actions, to be followed if a monitoring device measures an operating parameter outside the limit(s) established under §63.847(h), or if visible emissions from an exhaust stack indicating abnormal operation of a control device are observed by the owner/operator during the daily inspection required in §63.848(g).

Condition 155: Startup, shutdown, and malfunction plan and reports
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(c)(2), Subpart LL

Item 155.1:

This Condition applies to:

Emission Unit: S00002

Process: BAK

Emission Unit: S00003

Process: GMS

Item 155.1:

This Condition applies to Emission Unit: S-00001

Process: POT

Item 155.2.3:

The owner/operator shall develop a written plan as described in §63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the standard. The plan does not have to be submitted with the permit application or included in the operating permit. The New York State DEC may review the plan upon request. In addition to the information required in §63.6(e)(3), the plan shall include records of each event as required by §63.10(b) and the owner/operator shall record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in §63.6(e)(3)(iv).

Condition 156: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:40CFR 63.850(e)(4), Subpart LL

Item 156.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00001
Process: POT

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 156.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In addition to the general records required by §63.10(b), the owner/operator shall maintain records of the following information:

- 1) Daily production rate of aluminum;
- 2) A copy of the startup, shutdown, and malfunction plan;
- 3) Records supporting a request for reduced sampling of potlines;
- 4) Records, such as a checklist or the equivalent, demonstrating that the daily visual inspection of the exhaust stack for each control device has been performed as required in §63.848(g), including the results of each inspection;
- 5) Records documenting the corrective actions taken when the limit(s) for an operating parameter established under §63.847(h) were exceeded, or when visible emissions indicating abnormal operation were observed from a control device stack during a daily inspection required under §63.848(g);
- 6) Records documenting the portion of TF that is measured as particulate matter and the portion that is measured as gaseous when the particulate and gaseous fractions are quantified separately using an approved test method.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 157: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:6 NYCRR 249.3 (a)

Item 157.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 157.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The current emission source configuration is considered BART for emissions of PM-10. The current emissions of 24 tons per year is the emission limit effective January 1, 2014. Testing shall be completed under an approved protocol within 6 months after the emission limit effective date above. Emission factors established during the stack test shall be used to calculate emissions on an annual basis rolled monthly. Monitoring of the control device is accomplished under the requirements of the primary aluminum MACT within Alcoa's Title V permit and also satisfies CAM requirements.

Upper Permit Limit: 24 tons per year

Reference Test Method: EPA Method 201A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 158: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 249.3 (a)

Item 158.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 158.2:

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The current emission source configuration is considered BART for emissions of Oxides of Nitrogen. The current emissions of 203 tons per year is the emission limit effective January 1, 2014. Testing shall be completed under an approved protocol within 6 months after the emission limit effective date above. Emission factors established during the stack test shall be used to calculate emissions on an annual basis rolled monthly.

Upper Permit Limit: 203 tons per year

Reference Test Method: EPA RM 7E

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 159: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.843(c)(1), Subpart LL

Item 159.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Process: BAK

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 159.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator shall not discharge or cause to be discharged into the atmosphere any emissions of total fluorides (TF) in excess of the limit specified below:

- TF shall not exceed 0.20 lb/ton of green anode.

Parameter Monitored: FLUORIDES

Upper Permit Limit: 0.20 pounds per ton

Reference Test Method: EPA METHOD 13A or ALT

Monitoring Frequency: ANNUALLY

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Averaging Method: CALENDAR YEAR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 160: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.843(c)(2), Subpart LL

Item 160.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 160.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator shall not discharge or cause to be discharged into the atmosphere any emissions of polycyclic organic matter (POM) in excess of the limit specified below:

- POM shall not exceed 0.18 lb/ton of green anode.

Parameter Monitored: 40 CFR 63 SUBPART LL - POM

Upper Permit Limit: 0.18 pounds per ton

Reference Test Method: EPA METHOD 315

Monitoring Frequency: ANNUALLY

Averaging Method: CALENDAR YEAR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 161: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(d)(4), Subpart LL

Item 161.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 161.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The initial performance test and all subsequent performance tests shall be conducted in accordance with the requirements of the general provisions in 40 CFR Part 63 Subpart A, the approved test plan, and the procedures in 40 CFR Part 63.847. For each anode bake furnace the owner or operator shall measure and record the emission rate of polycyclic organic matter (POM) exiting the exhaust stack(s) of the primary emission control system for each anode bake furnace.

Using the equation in 40 CFR Part 63.847(e)(4), the owner or operator shall compute and record the average of at least three runs each year to determine compliance with the applicable emission limit for POM. Compliance is demonstrated when the emission rate of POM is equal to or less than the applicable POM emission limit in 40 CFR Part 63.843(c)(2).

Parameter Monitored: 40 CFR 63 SUBPART LL - POM

Upper Permit Limit: 0.18 pounds per ton

Reference Test Method: EPA METHOD 315

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 162: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.847(d)(4), Subpart LL

Item 162.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Process: BAK

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 162.2:



Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The initial performance test and all subsequent performance tests shall be conducted in accordance with the requirements of the general provisions in 40 CFR Part 63 Subpart A, the approved test plan, and the procedures in 40 CFR Part 63.847. For each anode bake furnace the owner or operator shall measure and record the emission rate of total fluorides (TF) exiting the exhaust stack(s) of the primary emission control system for each anode bake furnace.

Using the equation in 40 CFR Part 63.847(e)(3), the owner or operator shall compute and record the average of at least three runs each year to determine compliance with the applicable emission limit for TF. Compliance is demonstrated when the emission rate of TF is equal to or less than the applicable TF emission limit in 40 CFR Part 63.843(c)(1).

Parameter Monitored: FLUORIDES

Upper Permit Limit: 0.20 pounds per ton

Reference Test Method: EPA METHOD 13B OR ALT

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 163: Calculation of anode bake furnace TF emission rate
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.847(e)(3), Subpart LL

Item 163.1:

This Condition applies to Emission Unit: S-00002
Process: BAK

Item 163.2:

The owner/operator shall determine compliance with the applicable TF emission limits by computing the emission rate (E_b) from each anode bake furnace using the following equation (Equation 2):

$$E_b = (C_s \times Q_{sd}) / (P_b \times K)$$

E_b = emission rate of TF, kg/mg (lb/ton) of green anodes produced;



C_s =concentration of TF, mg/dscm (mg/dscf);

Q_{sd} =volumetric flowrate of effluent gas, dscm/hr (dscf/hr);

P_b =quantity of green anode material placed in the furnace, mg/hr (ton/hr); and

K = conversion factor, 106 mg/kg (453,600 mg/lb)

**Condition 164: Calculation of anode bake furnace POM emission rate
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(e)(4), Subpart LL

Item 164.1:

This Condition applies to Emission Unit: S-00002
Process: BAK

Item 164.2:

The owner/operator shall determine compliance with the applicable POM emission limits by computing the emission rate (E_b) from each anode bake furnace using the following equation (Equation 2):

$$E_b = (C_s \times Q_{sd}) / (P_b \times K)$$

E_b =emission rate of POM, kg/mg (lb/ton) of green anodes produced;

C_s =concentration of POM, mg/dscm (mg/dscf);

Q_{sd} =volumetric flowrate of effluent gas, dscm/hr (dscf/hr);

P_b =quantity of green anode material placed in the furnace, mg/hr (ton/hr); and

K = conversion factor, 106 mg/kg (453,600 mg/lb)

**Condition 165: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(e)(7), Subpart LL

Item 165.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Item 165.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall determine compliance with the applicable total fluorides (TF) and polycyclic organic matter (POM) emission limits by calculating the rate that green anode material is introduced into the anode baking furnace. This shall be determined by dividing the number

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of operating hours in the calendar month into the weight of green anode material used during the calendar month in which the performance test was conducted.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 166: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(h)(3), Subpart LL

Item 166.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM
CAS No: 068188-85-2 FLUORIDES

Item 166.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall determine the operating limits and monitoring frequency for each control device that is to be monitored as required in §63.848(f). The owner/operator may redetermine the upper and/or lower operating limits, as appropriate, based on historical data or other information and submit an application to the Department to change the applicable limit(s). The redetermined limits shall become effective upon approval of an updated Control Device Monitoring Plan (CDMP) by the Department. Redetermined limits will not require a modification to the current Title V permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 167: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.848(c), Subpart LL

Item 167.1:

The Compliance Certification activity will be performed for:

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Facility DEC ID: 6405800003



Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 068188-85-2 FLUORIDES

Item 167.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Using the procedures in 40 CFR 63.847 and in the approved test plan, the owner/operator shall monitor total fluoride (TF) emissions from each anode bake furnace on an annual basis. The owner/operator shall compute and record the annual average of TF emissions from at least three runs to determine compliance with the applicable emission limit. The owner/operator must include all valid runs in the annual average.

Parameter Monitored: FLUORIDES

Upper Permit Limit: 0.20 pounds per ton

Reference Test Method: EPA METHOD 13B or ALT

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 168: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.848(c), Subpart LL

Item 168.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 168.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Using the procedures in 40 CFR 63.847 and in the approved



test plan, the owner/operator shall monitor polycyclic organic matter (POM) emissions from each anode bake furnace on an annual basis. The owner/operator shall compute and record the annual average of POM emissions from at least three runs to determine compliance with the applicable emission limit. The owner/operator must include all valid runs in the annual average.

Parameter Monitored: 40 CFR 63 SUBPART LL - POM

Upper Permit Limit: 0.18 pounds per ton

Reference Test Method: EPA RM 315

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 169: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.848(f)(1), Subpart LL

Item 169.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Process: BAK

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

Item 169.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall install, operate, calibrate, and maintain a continuous parameter monitoring system for each emission control device. The owner/operator shall submit for approval by the New York State DEC a description of the parameter(s) to be monitored, the operating limits, and the monitoring frequency to ensure that the control device is being properly operated and maintained. An explanation of the criteria used for selection of the parameter(s), the operating limits, and the monitoring frequency, including how these relate to emission control also shall be submitted to the New York State DEC. Except as provided in 40 CFR 63.848(1), for dry alumina scrubbers, a device for the measurement of alumina flow shall be installed, monitored and recorded in accordance

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with the parametric monitoring plan.

Reference Test Method: 4075-TF

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 170: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.848(j), Subpart LL

Item 170.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Process: BAK

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 170.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of a new or existing potline or anode bake furnace shall install, operate, and maintain a monitoring device to determine the daily weight of green anode material placed in the anode bake furnace. The weight of green anode material may be determined by monitoring the weight of all anodes or by monitoring the number of anodes placed in the furnace and determining an average weight from measurements of a representative sample of anodes.

Monitoring Frequency: DAILY

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 171: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(e)(4), Subpart LL

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Item 171.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Process: BAK

Regulated Contaminant(s):

CAS No: ONY100-00-0 HAP

Item 171.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In addition to the general records required by §63.10(b), the owner/operator shall maintain records of the following information:

- 1) Daily production rate of green anode material placed in the anode bake furnace;
- 2) A copy of the startup, shutdown, and malfunction plan;
- 3) Records, such as a checklist or the equivalent, demonstrating that the daily visual inspection of the exhaust stack for each control device has been performed as required in §63.848(g), including the results of each inspection;
- 4) Records documenting the corrective actions taken when the limit(s) for an operating parameter established under §63.847(h) were exceeded, or when visible emissions indicating abnormal operation were observed from a control device stack during a daily inspection required under §63.848(g);
- 5) Records documenting the portion of TF that is measured as particulate matter and the portion that is measured as gaseous when the particulate and gaseous fractions are quantified separately using an approved test method.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 172: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(h)(1), Subpart LL

Item 172.1:



The Compliance Certification activity will be performed for:

Emission Unit: S-00002
Process: BAK Emission Source: SS78S

Regulated Contaminant(s):
CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM
CAS No: 068188-85-2 FLUORIDES

Item 172.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall ensure that the alumina flow to the dry alumina scrubber (emission control SS78S) remains greater than or equal to the level set in the latest Department approved Control Device Monitoring Plan over each 16 hour period.

Monitoring Frequency: HOURLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 173: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 173.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002 Emission Point: S0078
Process: BAK Emission Source: SS078

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 173.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The NOx RACT compliance plan submitted to NYSDEC in 1994 determined that control of NOx is not technically feasible due to the nature and configuration of the anode bake furnace burners. Thus the current equipment configuration is considered RACT.

The Facility has completed a BART evaluation, in which the current operating configuration is considered BART level

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control, which also satisfies RACT.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 174: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212.10 (c) (3)

Item 174.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00002

Emission Point: S0078

Process: BAK

Emission Source: SS078

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 174.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Control of VOC emissions from this source were shown to be technically infeasible in the RACT analysis submitted to the department in September of 1998. The alumina dry scrubber will continue to be operated and reported under the guidelines of 40 CFR 63 Subpart LL for Primary Aluminum Production.

Facility shall perform and submit, to the Department, a new VOC RACT determination for this emission source during the term of this permit.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 175: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.847(h)(3), Subpart LL

Item 175.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00003

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Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 175.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall determine the operating limits and monitoring frequency for each control device that is to be monitored as required in §63.848(f). The owner/operator may redetermine the upper and/or lower operating limits, as appropriate, based on historical data or other information and submit an application to the Department to change the applicable limit(s). The redetermined limits shall become effective upon approval of an updated Control Device Monitoring Plan (CDMP) by the Department. Redetermined limits will not require a modification to the current Title V permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 176: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.848(f)(2), Subpart LL

Item 176.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00003

Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 176.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall install, operate, calibrate, and maintain a continuous parameter monitoring system for each emission control device. The owner/operator shall submit for approval by the New York State DEC a description of the parameter(s) to be monitored, the operating limits, and the monitoring frequency to ensure that the control device is being properly operated and maintained. An explanation of the criteria used for selection of the parameter(s), the operating limits, and the monitoring



frequency, including how these relate to emission control also shall be submitted to the New York State DEC. Except as provided in 40 CFR 63.848(l), for dry coke scrubbers, a device for the measurement of coke flow shall be installed, monitored and recorded in accordance with the parametric monitoring plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 177: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.848(f)(2), Subpart LL

Item 177.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00003

Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 177.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator shall install, operate, calibrate, and maintain a continuous parameter monitoring system for each emission control device. The owner/operator shall submit for approval by the New York State DEC a description of the parameter(s) to be monitored, the operating limits, and the monitoring frequency to ensure that the control device is being properly operated and maintained. An explanation of the criteria used for selection of the parameter(s), the operating limits, and the monitoring frequency, including how these relate to emission control also shall be submitted to the New York State DEC. Except as provided in 40 CFR 63.848(l), for dry coke scrubbers, a device for the measurement of air flow shall be installed, monitored and recorded in accordance with the parametric monitoring plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).



Condition 178: Emission Limits for Existing Sources - Paste Production Plants
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.843(b), Subpart LL

Item 178.1:

This Condition applies to Emission Unit: S-00003
Process: GMS

Item 178.2:

The owner or operator shall install, operate, and maintain equipment to capture and control POM emissions from each paste production plant.

(1) The emission capture system shall be installed and operated to meet the generally accepted engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in Chapters 3 and 5 of "Industrial Ventilation: A Handbook of Recommended Practice" (incorporated by reference in Sec. 63.841 of this part); and

(2) Captured emissions shall be routed through a closed system to a dry coke scrubber.

Condition 179: Initial compliance provisions for paste production plants
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.847(f), Subpart LL

Item 179.1:

This Condition applies to Emission Unit: S-00003
Process: GMS

Item 179.2:

Initial compliance with the standards for existing and new paste production plants in §§63.843(b) and 63.844(b) will be demonstrated through site inspection(s) and review of site records by the applicable regulatory authority.

Condition 180: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.850(e)(4), Subpart LL

Item 180.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00003
Process: GMS

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP



Item 180.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In addition to the general records required by 40 CFR 63.10(b), the owner/operator shall maintain records of the following information:

- 1) A copy of the startup, shutdown, and malfunction plan;
- 2) Records of design information for paste production plant capture systems;
- 3) Records, such as a checklist or the equivalent, demonstrating that the daily visual inspection of the exhaust stack for each control device has been performed as required in 40 CFR 63.848(g), including the results of each inspection;
- 4) Records documenting the corrective actions taken when the limit(s) for an operating parameter established under 40 CFR 63.847(h) were exceeded, or when visible emissions indicating abnormal operation were observed from a control device stack during a daily inspection required under 40 CFR 63.848(g).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 181: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.847(h)(2), Subpart LL

Item 181.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00003

Process: GMS

Emission Source: SS100

Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

Item 181.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



40 CFR 52.21

Item 183.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 183.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 183.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 183.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 183.6:

The Compliance Certification activity will be performed for:

Emission Unit: S-00004

Process: M16

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 183.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from this emission source shall not exceed 15 tons during any 12 month period. Source owner must maintain records that demonstrate compliance with this emission limit. Records should include: any stack test reports, the number of hours the spent potliner handling is being performed, the number of hours that the baghouse is not in operation while spent potliner handling is occurring, and information that shows the baghouse is being operated with the manufacturer's specifications for pressure drop and air/cloth ratio. Compliance testing shall be completed upon request from the Department.

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DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 185: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.10 (c) (1)

Item 185.1:

The Compliance Certification activity will be performed for:

Emission Unit: S-00005
Process: PUN

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 185.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The emission rate potential of volatile organic compound (VOC) from each emission point in this process shall remain less than 3.0 pounds per hour. A reasonably available control technology (RACT) analysis is not required for emission points with VOC emission rate potentials less than 3.0 pounds per hour at facilities located outside of the Lower Orange County and New York City metropolitan areas. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: VOC
Upper Permit Limit: 3.0 pounds per hour
Reference Test Method: EPA RM 18 or 25A
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 186: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 186.1:

The Compliance Certification activity will be performed for:

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Facility DEC ID: 6405800003



Emission Unit: W-00001
Process: WWT

Regulated Contaminant(s):
CAS No: 000074-90-8 HYDROCYANIC ACID

Item 186.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) hydrogen cyanide has been issued an environmental rating of A. The emission rate potential of hydrogen cyanide from each emission source in this process shall remain less than 1 pound per hour. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 1.0 pounds per hour

Reference Test Method: EPA Method 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 187: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 187.1:

The Compliance Certification activity will be performed for:

Emission Unit: W-00001
Process: WWT

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 187.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR Part 212.4(a) ammonia has been issued an environmental rating of C. The emission rate potential of ammonia from each emission source in this process shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

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Upper Permit Limit: 10 pounds per hour

Reference Test Method: EPA CTM-027

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 188: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (1)

Item 188.1:

The Compliance Certification activity will be performed for:

Emission Unit: W-00001

Process: WWT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 188.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission rate potential of volatile organic compound (VOC) from each emission point in this process shall remain less than 3.0 pounds per hour. A reasonably available control technology (RACT) analysis is not required for emission points with VOC emission rate potentials less than 3.0 pounds per hour at facilities located outside of the Lower Orange County and New York City metropolitan areas. Compliance testing shall be conducted upon the request of the Department.

Reference Test Method: EPA RM 18 or 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 189: Contaminant List
Effective for entire length of Permit

Applicable State Requirement:ECL 19-0301

Item 189.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000074-90-8
Name: HYDROCYANIC ACID

New York State Department of Environmental Conservation

Permit ID: 6-4058-00003/00365

Facility DEC ID: 6405800003



CAS No: 000111-42-2
Name: ETHANOL, 2,2'-IMINOBIS-

CAS No: 000463-58-1
Name: CARBONYL SULFIDE

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 001746-01-6
Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 003268-87-9
Name: 1,2,3,4,6,7,8,9-OCTACHLORODIBENZODIOXIN

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3
Name: HYDROGEN FLUORIDE

CAS No: 007664-41-7
Name: AMMONIA

CAS No: 007782-50-5
Name: CHLORINE

CAS No: 019408-74-3
Name: 1,2,3,7,8,9-HEXACHLORODIBENZO-P-DIOXIN

CAS No: 035822-46-9
Name: 1,2,3,4,6,7,8-HEPTACHLORODIBENZODIOXIN

CAS No: 039001-02-0
Name: OCTACHLORODIBENZOFURANS, TOTAL

CAS No: 039227-28-6
Name: 1,2,3,4,7,8-HEXACHLORODIBENZO[B,E][1,4]DIOXIN

CAS No: 040321-76-4
Name: 1,2,3,7,8-PENTACHLORODIBENZO-P-DIOXIN

CAS No: 051207-31-9
Name: 2,3,7,8-TETRACHLORODIBENZOFURAN

CAS No: 055673-89-7
Name: 1,2,3,4,7,8,9-HEPTACHLORODIBENZOFURAN

CAS No: 057117-31-4



Name: 2,3,4,7,8-PENTACHLORODIBENZOFURAN

CAS No: 057117-41-6

Name: 1,2,3,7,8-PENTACHLORODIBENZOFURAN

CAS No: 057117-44-9

Name: 1,2,3,6,7,8-HEXACHLORODIBENZOFURAN

CAS No: 057653-85-7

Name: 1,2,3,6,7,8-HEXACHLORODIBENZO-P-DIOXIN

CAS No: 060851-34-5

Name: 2,3,4,6,7,8-HEXACHLORODIBENZOFURAN

CAS No: 067562-39-4

Name: 1,2,3,4,6,7,8-HEPTACHLORODIBENZOFURAN

CAS No: 068188-85-2

Name: FLUORIDES

CAS No: 070648-26-9

Name: 1,2,3,4,7,8-HEXACHLORODIBENZOFURAN

CAS No: 072918-21-9

Name: 1,2,3,7,8,9-HEXACHLORODIBENZOFURAN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY505-00-0

Name: 40 CFR 63 SUBPART LL - POM

CAS No: 0NY998-00-0

Name: VOC

**Condition 190: Unavoidable noncompliance and violations
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 190.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or



upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 191: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Part 209

Item 191.1:

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The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: S-00001
Process: POT

Emission Unit: S-00002
Process: BAK

Regulated Contaminant(s):
CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM
CAS No: 068188-85-2 FLUORIDES

Item 191.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The more stringent requirements of 40 CFR 63 Subpart LL apply to the emissions of fluorides, polycyclic organic matter (POM) and opacity at this facility. As long as the facility is in compliance with the requirements of Subpart LL, contained elsewhere in this permit, then it is in compliance with the requirements of 6 NYCRR Part 209.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 192: Emissions other than total fluorides
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 209.4

Item 192.1:

This Condition applies to:

Emission Unit: S00001

Emission Unit: S00002

Emission Unit: S00003

Emission Unit: S00004

Emission Unit: S00005

Emission Unit: S00006

Item 192.2:

Emissions of air contaminants other than total fluorides from any air contamination source in a

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been issued an environmental rating of "B". The emission rate potential of Hydrogen Fluoride from each of the emission sources listed above shall remain less than 10 pounds per hour. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: HYDROGEN FLUORIDE

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: Method 4075 TF

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 195: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 195.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-00003

Process: FBB

Emission Unit: A-00003

Process: MH2

Emission Source: M004A

Emission Unit: C-00001

Process: CD1

Emission Unit: C-00002

Process: CD2

Emission Unit: M-00001

Emission Unit: M-00002

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

Item 195.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR 212.4(a), Hydrogen Chloride has been issued an environmental rating of "B". The emission rate potential of Hydrogen Chloride from each of the emission sources listed above shall remain less than 10

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pounds per hour. Compliance testing shall be conducted upon request from the Department.

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 10.0 pounds per hour

Reference Test Method: EPA RM 26

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 196: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 227-2.4 (b) (1)

Item 196.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 196.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A NO_x RACT and BART analysis and subsequent approval by the Department determined the emissions of NO_x at a rate not to exceed 0.30 lbs/mmBtu of heat input to be compliant. The owner/operator must show compliance through emissions testing once every five years.

Upper Permit Limit: 0.30 pounds per million Btus

Reference Test Method: EPA method 7E

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 197: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 249.3 (f)

Item 197.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 197.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The conditions in this permit for NO_x, SO₂, and/or PM₁₀ established under Part 249 are based on New York's Best Available Retrofit Technology (BART) Rule (6 NYCRR Part 249), are effective on the date of this permit's issuance, and are state-enforceable. Federal enforceability of these facility-specific conditions is effective on the date on which these emission limits, as submitted to EPA as a revision to New York State's Implementation Plan for Regional Haze, are published in the Federal Register.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

****** Emission Unit Level ******

**Condition 198: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 227-1.4 (a)

Item 198.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

Process: OIL

Item 198.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Any person who owns a stationary combustion installation (excluding gas turbines), with a total maximum heat input capacity exceeding 250 million Btu per hour shall install, operate in accordance with manufacturer's instructions, and properly maintain, accurate instruments satisfying the criteria in appendix B of title 40, part 60 of the Code of Federal Regulations, or approved by the commissioner on an individual case basis, for continuously monitoring and recording opacity, and when sulfur dioxide continuous monitoring is required by Part 225 of this Title, for continuously monitoring and recording either the percent oxygen or carbon dioxide in the flue gases from such

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installations at all times that the combustion installation is in service. Where gas is the only fuel burned, monitoring and recording of opacity is not required.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: APPENDIX B, 40 CFR 60

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

