

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 6405800024**



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 6-4058-00024/00077  
Mod 0 Effective Date: 09/01/2002 Expiration Date: 09/01/2007  
Mod 1 Effective Date: 06/01/2004 Expiration Date: 09/01/2007

Permit Issued To: REYNOLDS METALS CO  
201 ISABELLA ST  
PITTSBURGH, PA 15212-5858

Contact: DENNIS KRAUSE  
ALCOA INC  
PO BOX 150  
MASSENA, NY 13662-0150  
(315) 764-4642

Facility: REYNOLDS METALS ST LAWRENCE REDUCTION PL  
194 COUNTY ROUTE 45  
MASSENA, NY 13662

Contact: DENNIS KRAUSE  
ALCOA INC  
PO BOX 150  
MASSENA, NY 13662-0150  
(315) 764-4642

Description:

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: BRIAN D FENLON  
DIVISION OF ENVIRONMENTAL PERMITS  
STATE OFFICE BLDG, 317 WASHINGTON ST  
WATERTOWN, NY 13601-3787

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 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 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 and Modifications

Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of Applications 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 and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**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,



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regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 4.1:**

The Department reserves the right 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;  
or conditions of the permit;  
and 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  
regulations of the Department  
related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(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



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**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: REYNOLDS METALS CO  
201 ISABELLA ST  
PITTSBURGH, PA 15212-5858

Facility: REYNOLDS METALS ST LAWRENCE REDUCTION PL  
194 COUNTY ROUTE 45  
MASSENA, NY 13662

Authorized Activity By Standard Industrial Classification Code:  
3334 - PRIMARY ALUMINUM



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 201-3.2(c)(17): Surface Coating Exemption
- 2 6NYCRR 201-6: Emission Unit Definition
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-1 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 1-2 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 1-3 6NYCRR 212: Compliance Certification
- 10 6NYCRR 212.3(b): Compliance Certification
- 1-4 6NYCRR 212.4(a): Compliance Certification
- 1-5 6NYCRR 212.4(a): Compliance Certification
- 13 6NYCRR 212.4(c): Compliance Certification
- 14 6NYCRR 212.5(b): Emissions from a Single device through multiple emission points
- 15 6NYCRR 212.6(a): Compliance Certification
- 16 6NYCRR 212.10(c)(1): Compliance Certification
- 17 6NYCRR 226: Equipment Specifications for Cold Cleaning Batch Degreasing
- 1-6 6NYCRR 227-2: Compliance Certification
- 1-7 6NYCRR 257-3: Compliance Certification
- 20 6NYCRR 257-8: Compliance Certification
- 21 40CFR 52.21, Subpart A: Compliance Certification
- 1-8 40CFR 63, Subpart A: General Provisions
- 22 40CFR 63.841, Subpart LL: Incorporation by Reference
- 23 40CFR 63.847(b), Subpart LL: Compliance Provisions - Test Plan
- 24 40CFR 63.847(c), Subpart LL: Compliance Provisions - Initial Performance Test
- 25 40CFR 63.849(a), Subpart LL: Reference test methods for TF and POM emissions
- 26 40CFR 63.849(e), Subpart LL: Alternative test methods for TF or POM emissions
- 1-9 40CFR 63.1500(b), Subpart RRR: Applicability
- 1-10 40CFR 63.1505(k), Subpart RRR: Compliance Certification
- 1-11 40CFR 63.1506(p), Subpart RRR: Operating requirements - Corrective Action
- 1-12 40CFR 63.1510(b), Subpart RRR: Monitoring and Compliance Requirements - OM&M Plan
- 1-13 40CFR 63.1510(s), Subpart RRR: Site-specific requirements for secondary aluminum processing units
- 1-14 40CFR 63.1511(b), Subpart RRR: Initial Performance Test
- 1-15 40CFR 63.1511(c), Subpart RRR: Test Methods
- 1-16 40CFR 63.1515, Subpart RRR: Secondary Aluminum Notifications
- 1-17 40CFR 63.1516, Subpart RRR: Secondary Aluminum MACT Reports
- 1-18 40CFR 63.1517, Subpart RRR: Secondary Aluminum MACT Recordkeeping
- 1-19 40CFR 68: Accidental release provisions.
- 27 40CFR 68: Accidental release provisions.
- 28 40CFR 82, Subpart F: Recycling and Emissions Reduction

**Emission Unit Level**



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- 29 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 30 6NYCRR 201-6: Process Definition By Emission Unit

**EU=B-OIL01**

- 1-20 6NYCRR 225-1.8(a): Compliance Certification
- 31 6NYCRR 227-1.3(a): Compliance Certification
- 32 6NYCRR 227-1.6(a): Corrective Action
- 33 6NYCRR 227-1.6(b): Corrective Action
- 34 6NYCRR 227-1.6(c): Corrective Action
- 35 6NYCRR 227-1.6(d): Corrective Action
- 36 6NYCRR 227-1.7: General Provisions

**EU=B-OIL01,Proc=I03**

- 37 6NYCRR 225-1.2(a)(2): Compliance Certification
- 39 6NYCRR 225-1.8(d): Sampling, compositing, and analysis of fuel samples

**EU=B-OIL01,Proc=I03,ES=0222H**

- 1-21 6NYCRR 227.2(b)(1): Compliance Certification

**EU=B-OIL01,Proc=I03,ES=0322H**

- 1-22 6NYCRR 227.2(b)(1): Compliance Certification

**EU=C-ARB01**

- 42 40CFR 63.843(b), Subpart LL: Emission Limits for Existing Sources - Paste Production Plants
- 43 40CFR 63.847(f), Subpart LL: Initial compliance provisions for paste production plants
- 44 40CFR 63.847(h)(2), Subpart LL: Selection of monitoring parameters - paste production plants
- 45 40CFR 63.847(h)(3), Subpart LL: Selection of monitoring parameters - redetermining operating limits
- 46 40CFR 63.850(e)(4), Subpart LL: Compliance Certification

**EU=C-ARB01,Proc=N03**

- 1-23 6NYCRR 225-1.8(a): Compliance Certification
- 1-24 40CFR 52.21, Subpart A: Compliance Certification

**EU=C-ARB01,Proc=N10**

- 49 6NYCRR 212.10(c): Compliance Certification

**EU=E-WCST1**

- 1-25 40CFR 63.1505(k)(4), Subpart RRR: SAPU emission limits for individual emission units
- 1-26 40CFR 63.1506(b), Subpart RRR: Compliance Certification
- 1-27 40CFR 63.1510(j), Subpart RRR: Compliance Certification
- 1-28 40CFR 63.1510(t), Subpart RRR: Calculation of Secondary Aluminum Processing Unit Emissions
- 1-29 40CFR 63.1512(e), Subpart RRR: Compliance Certification
- 1-30 40CFR 63.1512(h)(1), Subpart RRR: Performance Test/Compliance Demonstration Requirements and Procedures - In-line fluxer
- 1-31 40CFR 63.1512(j), Subpart RRR: Compliance Certification

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1-32 40CFR 63.1512(o), Subpart RRR: Compliance Certification

**EU=E-WCST1,Proc=J01**

- 1-33 40CFR 63.1502(a), Subpart RRR: Incorporation by reference material
- 1-34 40CFR 63.1505(i), Subpart RRR: Group 1 Furnace Dioxin/Furan Limit
- 1-35 40CFR 63.1505(i), Subpart RRR: Compliance Certification
- 1-36 40CFR 63.1505(j)(1), Subpart RRR: Compliance Certification
- 1-37 40CFR 63.1505(j)(2), Subpart RRR: Compliance Certification
- 1-38 40CFR 63.1506(d), Subpart RRR: Compliance Certification
- 1-39 40CFR 63.1510(c), Subpart RRR: Compliance Certification
- 1-40 40CFR 63.1510(e), Subpart RRR: Compliance Certification
- 1-41 40CFR 63.1510(u), Subpart RRR: Secondary aluminum processing unit compliance by individual emission unit demonstration
- 1-42 40CFR 63.1511(a), Subpart RRR: Site-specific test plan
- 1-43 40CFR 63.1511(e), Subpart RRR: Compliance Certification
- 1-44 40CFR 63.1511(f), Subpart RRR: Testing of Representative Emission Units
- 1-45 40CFR 63.1511(g), Subpart RRR: Establishment of Monitoring and Operating Parameter

Values

- 1-46 40CFR 63.1512(k), Subpart RRR: Performance Test/Compliance Demonstration

Requirements and

Procedures - Feed/Charge Weight Measurement.

- 1-47 40CFR 63.1512(r), Subpart RRR: Compliance Certification
  - 1-48 40CFR 63.1513(b), Subpart RRR: Equations for Determining Compliance - PM, HCl and D/F
- emission limits
- 1-49 40CFR 63.1515(a)(6), Subpart RRR: Notification of performance test date
  - 1-50 40CFR 63.1515(b), Subpart RRR: Compliance Certification
  - 1-51 40CFR 63.1516(b), Subpart RRR: Compliance Certification

**EU=E-WCST1,Proc=J04**

- 1-52 40CFR 63.1502(a), Subpart RRR: Incorporation by reference material
- 1-53 40CFR 63.1505(i), Subpart RRR: Group 1 Furnace Dioxin/Furan Limit
- 1-54 40CFR 63.1505(i), Subpart RRR: Compliance Certification
- 1-55 40CFR 63.1505(j)(1), Subpart RRR: Compliance Certification
- 1-56 40CFR 63.1505(j)(2), Subpart RRR: Compliance Certification
- 1-57 40CFR 63.1505(j)(3), Subpart RRR: Emission Standards for Affected Sources and Emission

Units

- In-line fluxers using no reactive flux materials

- 1-58 40CFR 63.1506(d), Subpart RRR: Compliance Certification
- 1-59 40CFR 63.1510(c), Subpart RRR: Compliance Certification
- 1-60 40CFR 63.1510(e), Subpart RRR: Compliance Certification
- 1-61 40CFR 63.1510(u), Subpart RRR: Secondary aluminum processing unit compliance by individual emission unit demonstration
- 1-62 40CFR 63.1511(a), Subpart RRR: Site-specific test plan
- 1-63 40CFR 63.1511(e), Subpart RRR: Compliance Certification
- 1-64 40CFR 63.1511(f), Subpart RRR: Testing of Representative Emission Units
- 1-65 40CFR 63.1511(g), Subpart RRR: Establishment of Monitoring and Operating Parameter

Values

- 1-66 40CFR 63.1512(k), Subpart RRR: Performance Test/Compliance Demonstration



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Requirements and

Procedures - Feed/Charge Weight Measurement.

1-67 40CFR 63.1512(r), Subpart RRR: Compliance Certification

1-68 40CFR 63.1513(b), Subpart RRR: Equations for Determining Compliance - PM, HCl and D/F emission limits

1-69 40CFR 63.1515(a)(6), Subpart RRR: Notification of performance test date

1-70 40CFR 63.1515(b), Subpart RRR: Compliance Certification

1-71 40CFR 63.1516(b), Subpart RRR: Compliance Certification

**EU=E-WCST1,Proc=J04,ES=01820**

50 40CFR 63.1505(j)(3), Subpart RRR: Emission Standards for Affected Sources and Emission

Units

- In-line fluxers using no reactive flux materials

51 40CFR 63.1506(l), Subpart RRR: Operating Requirements - In-line fluxer using no reactive flux material

52 40CFR 63.1510(m), Subpart RRR: Monitoring and Compliance Requirements - In-line fluxers using no reactive flux

53 40CFR 63.1512(h)(1), Subpart RRR: Performance Test/Compliance Demonstration

Requirements and

Procedures - In-line fluxer

54 40CFR 63.1516(b)(2)(vi), Subpart RRR: Compliance Certification

55 40CFR 63.1517(a), Subpart RRR: Compliance Certification

**EU=P-DIG01,Proc=E02**

1-72 40CFR 52.21, Subpart A: Compliance Certification

1-73 40CFR 52.21, Subpart A: Compliance Certification

**EU=P-OT001**

59 6NYCRR 212.5(d): Compliance Certification

60 6NYCRR 212.5(d): Compliance Certification

61 6NYCRR 212.5(d): Compliance Certification

62 6NYCRR 212.5(d): Compliance Certification

63 6NYCRR 212.10(c)(4)(iii): Compliance Certification

64 40CFR 63.846, Subpart LL: Compliance Certification

1-74 40CFR 63.846, Subpart LL: Compliance Certification

1-75 40CFR 63.846, Subpart LL: Compliance Certification

67 40CFR 63.846(b)(2), Subpart LL: Compliance Certification

1-76 40CFR 63.846(b)(2), Subpart LL: Compliance Certification

69 40CFR 63.847(d), Subpart LL: Compliance Certification

70 40CFR 63.847(d), Subpart LL: Compliance Certification

71 40CFR 63.847(d)(3), Subpart LL: Performance Test Requirements - Previous Control Device

Tests

72 40CFR 63.847(e)(6), Subpart LL: Calculation of aluminum production rate

73 40CFR 63.847(h)(1), Subpart LL: Selection of monitoring parameters - potlines and anode bake furnaces

1-77 40CFR 63.848(a), Subpart LL: Compliance Certification

1-78 40CFR 63.848(b), Subpart LL: Compliance Certification

76 40CFR 63.848(f), Subpart LL: Monitoring parameters for emission control devices



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- 1-79 40CFR 63.848(g), Subpart LL: Compliance Certification
- 78 40CFR 63.848(h), Subpart LL: Corrective action procedures
- 79 40CFR 63.848(i), Subpart LL: Exceedances
- 80 40CFR 63.848(k), Subpart LL: Accuracy and calibration requirements
- 81 40CFR 63.849(c), Subpart LL: Definition of potline in Method 14
- 82 40CFR 63.849(d), Subpart LL: Installation of manifolds for potlines subject to Method 14
- 83 40CFR 63.850(a)(5), Subpart LL: Notification of initial performance test
- 84 40CFR 63.850(a)(6), Subpart LL: Notification of initial compliance status
- 85 40CFR 63.850(b), Subpart LL: Performance test reports
- 86 40CFR 63.850(c)(1), Subpart LL: Startup, shutdown, and malfunction plan and reports
- 87 40CFR 63.850(c)(2), Subpart LL: Startup, shutdown, and malfunction plan and reports
- 1-80 40CFR 63.850(d), Subpart LL: Compliance Certification
- 89 40CFR 63.850(e)(1), Subpart LL: Compliance Certification
- 90 40CFR 63.850(e)(2), Subpart LL: Compliance Certification
- 91 40CFR 63.850(e)(3), Subpart LL: Compliance Certification
- 92 40CFR 63.850(e)(4), Subpart LL: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 93 ECL 19-0301: Contaminant List
- 94 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 95 6NYCRR 211.2: Air pollution prohibited
- 1-81 6NYCRR 212.4(a): Compliance Demonstration
- 1-82 6NYCRR 212.4(a): Compliance Demonstration
- 96 6NYCRR 212.4(a): Compliance Demonstration
- 97 6NYCRR 212.4(a): Compliance Demonstration
- 98 6NYCRR 212.4(a): Compliance Demonstration
- 99 6NYCRR 212.4(a): Compliance Demonstration

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**EU=P-OT001**

- 102 6NYCRR 209: Compliance Demonstration
- 103 6NYCRR 212.5(d): Compliance Demonstration

Mod 0 Permit Effective Date: 09/01/2002

Permit Expiration Date: 09/01/2007

Mod 1 Permit Effective Date: 06/01/2004

Permit Expiration Date: 09/01/2007



**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: Sealing - 6NYCRR Part 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6**

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.

**Item C: Maintenance of Equipment - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination

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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.

**Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2**

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Emergency Defense - 6NYCRR Part 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

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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 F: Recycling and Salvage - 6NYCRR Part 201-1.7**

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 6 NYCRR.

**Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8**

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.

**Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)**

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 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control

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requirements, regulations, or law.

- Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)**  
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, 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 K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 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 L: Certification by a Responsible Official - 6 NYCRR Part 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 M: Requirement to Comply With All Conditions - 6 NYCRR Part 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 N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

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**Requirements - 6 NYCRR Part 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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)**

The permittee 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. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 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 Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

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

**Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)**

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

**Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)**

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

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facility 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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Item T: Severability - 6 NYCRR Part 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 U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)**

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. 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.

**Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)**

No permit revision will be required for operating changes that contravene an express permit term, provided that such

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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 provisions 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 in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

**Item W: Permit Shield - 6 NYCRR Part 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

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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 X: Reopening for Cause - 6 NYCRR Part 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

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a shorter time period in the case of an emergency.

**Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1**

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

**Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Item AA: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**Item BB: 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 CC: Federally Enforceable Requirements - 40 CFR 70.6(b)**

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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.

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 1: Surface Coating Exemption**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 201-3.2(c)(17)**

**Item 1.1:**

The following activity is exempt from permitting requirements, but must be included in the Title V permit application: Surface coating and related operations which uses less than 25 gallons per month of coating materials (paints) and cleaning solvents, combined, subject to the following:

- (i) the facility is located outside of any severe ozone non attainment area; and
- (ii) all abrasive cleaning and surface coating operations are performed in an enclosed building where such operations are exhausted into appropriate emission control devices.

**Condition 2: Emission Unit Definition**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 2.1(From Mod 1):**

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

Emission Unit: B-OIL01

Emission Unit Description:

This emissions unit consists of emissions sources and emission points located in the Boiler Room, Facility 22H. There are two processes identified within this emissions unit, processes I01, and I03. These processes are identified in detail in the process description section of the application package.

Building(s): 22H



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**Item 2.2(From Mod 1):**

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

Emission Unit: C-ARB01

Emission Unit Description:

This emissions unit consists of emissions sources, control devices and emission points associated with the Carbon Plant (Anode side), Facility 22. There are seven processes identified within this emissions unit, processes N02, N03, N04, N05, N07, N08 and N10. This emissions unit also includes miscellaneous fugitive emissions generated from these processes.

Building(s): 22  
22A  
22B  
22C  
22D  
22E  
22F  
22G

**Item 2.3(From Mod 1):**

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

Emission Unit: E-WCST1

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF EMISSION SOURCES AND EMISSION POINTS LOCATED IN THE EAST AND WEST CAST HOUSES. THERE ARE THREE PROCESSES IDENTIFIED WITHIN THE EMISSION UNIT; PROCESS J01, J02, and J04. THE FURNACES ARE NATURAL GAS FIRED MELTER/HOLDERS. THIS EMISSION UNIT ALSO INCLUDES MISCELLANEOUS FUGITIVE EMISSIONS GENERATED WITHIN THE EAST AND WEST CAST HOUSE.

Building(s): 20  
20G

**Item 2.4(From Mod 1):**

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

Emission Unit: P-DIG01

Emission Unit Description:

This emission unit consists of emission sources, control devices, and emission points associated with the Cathode Digging Area, Facility 85.

Building(s): 85

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**Item 2.5(From Mod 1):**

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

Emission Unit: P-OT001

Emission Unit Description:

This emission unit consists of the three potlines.

Building(s): 70076

**Item 2.6(From Mod 0):**

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

Emission Unit: A-NOD01

Emission Unit Description:

This emissions unit consists of emissions sources located adjacent to the Anode Pin Room (on occasion this may also occur in other areas of the facility). There is one process identified within this emissions unit, process G01. This emissions unit results in fugitive emissions and is not associated with a ventilation system.

Building(s): 35

**Item 2.7(From Mod 0):**

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

Emission Unit: C-RSH01

Emission Unit Description:

This emissions unit consists of emissions sources, control devices and emission points associated with the Crusher Building, Facility 82. There is one process associated with this emissions unit, process F01. The emission point identified as 82002 includes several power roof vents and therefore specific emission point data is not provided. This emissions unit also includes miscellaneous fugitive emissions generated from the process.

Building(s): 82

**Item 2.8(From Mod 0):**

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

Emission Unit: D-ROS01

Emission Unit Description:

This emission unit consists of emissions sources associated with dross cooling processes and storage, facility 20 and 20C. This emission unit includes miscellaneous fugitive emissions from the processes.

Building(s): 20



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20C

20G

**Item 2.9(From Mod 0):**

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

Emission Unit: D-ROS02

Emission Unit Description:

This emission unit consists of emission sources associated with dross cooling in process Z01.

Building(s): 20  
20G

**Item 2.10(From Mod 0):**

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

Emission Unit: P-AINO1

Emission Unit Description:

This emission unit consists of emission sources associated with the paint shop, facility 31. There is one process associated with this emission unit, process Q01.

This emission unit consists of fugitive emissions generated from the process.

Building(s): 31

**Item 2.11(From Mod 0):**

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

Emission Unit: P-ARTW1

Emission Unit Description:

This emission unit consists of parts washers located throughout the Alcoa East facility.

**Item 2.12(From Mod 0):**

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

Emission Unit: U-LDG01

Emission Unit Description:

This emission unit consists of emission sources, control devices and emission points associated with the Unloading Shed, facility 25. There are 2 processes associated with this emission unit, processes P01 and P03.

There are four silos located in the courtyard, which are inactive; however, they provide structural support to the ore gallery and will not be removed. These are not air contamination sources, as they are not used and contain no product. Therefore these four silos, 25A, 25B, 25C, and 25D, are not identified as emission sources within this package.



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Building(s): 25A  
25B  
25D

**Item 2.13(From Mod 0):**

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

Emission Unit: W-WTR01

Emission Unit Description:

This emission unit consists of emission sources and emission points associated with the wastewater treatment operations, facility 63, 63A- 63J, 65, 65A, 65B, and 66. There is one process associated with this emission unit, process WW1. This emission unit includes miscellaneous fugitive emission sources.

Building(s): 63  
63A  
63B  
63C  
63D  
63E  
63F  
63G  
63H  
63J  
63L  
65  
65A  
65B  
66

**Condition 3: Recordkeeping and reporting of compliance monitoring  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 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;



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(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 between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 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 1-1: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-1.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-1.2:**

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 60 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

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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

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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 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-2: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-2.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-2.2:**

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.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 60 days after the anniversary date of four consecutive calendar quarters. The first report is due 60 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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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 60 days after the reporting period.  
The initial report is due 3/1/2005.  
Subsequent reports are due every 12 calendar month(s).

**Condition 7: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 202-2.1**

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:



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Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 202-2.5**

**Item 8.1:**

(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 1-3: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212**

**Replaces Condition(s) 9**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All sources that employ control devices to limit particulate emissions, shall be monitored and maintained according to the Operation and Maintenance (O & M) plan submitted and 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



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department for approval. Monitoring parameter measurements made outside normal operating ranges will trigger additional reporting according to the O&M Plan (at least semi-annually). Records shall be maintained for a minimum of five years.

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.3(b)**

**Item 10.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: C-RSH01

Process: F01                      Emission Source: 00182

Regulated Contaminant(s):

CAS No: 0NY075-00-0    PARTICULATES

**Item 10.2:**

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 0.150 grains per dry standard cubic foot of exhaust gas. Stack testing will be conducted on these or similar sources to determine compliance at least once during the term of the permit.

Upper Permit Limit: 0.150 grains per dscf

Reference Test Method: EPA RM 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-4: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**



**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 11**

**Item 1-4.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: E-WCST1

Process: J01

Emission Unit: E-WCST1

Process: J04

Emission Unit: P-OT001

Process: A02

Emission Source: B5156

Emission Unit: P-OT001

Process: A02

Emission Source: C5156

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To ensure proper control of Sulfur Dioxide, the North and South wet scrubbers shall operate with a Liquor Level between 73% and 95% of the total capacity for optimum acid gas removal. A PLC computer shall continuously track the Liquor level and a 24 hour average will be generated to compare to the operating limits. If the average falls outside the range, corrective action shall be taken and the excursion will be logged. A report of the number of times and the amount of time the average was outside the range and the corrective action taken shall be submitted semi-annually on a calendar year basis.

This Continuous Monitoring System (CMS) will be operated and maintained according to a CMS Operation and Maintenance Plan (CMS O&M) that will be submitted to the Department for review and approval. The CMS O&M plan will be updated as necessary and any changes shall also be submitted to the Department for approval.

Parameter Monitored: LIQUOR



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Lower Permit Limit: 73 percent  
Upper Permit Limit: 95 percent  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 24-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-5: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 12**

**Item 1-5.1:**

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

Emission Unit: P-OT001  
Process: A02                      Emission Source: B5156

Emission Unit: P-OT001  
Process: A02                      Emission Source: C5156

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

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To ensure proper control of Sulfur Dioxide, the North and South wet scrubbers shall operate with a pH within the range specified below for optimum acid gas removal. A PLC computer shall continuously track the pH and a 24 hour average will be generated to compare to the operating limits. If the average falls outside the range, corrective action shall be taken and the excursion will be logged. A report of the number of times and the amount of time the average was outside the range and the corrective action taken shall be submitted semi-annually on a calendar year basis.

This Continuous Monitoring System (CMS) will be operated and maintained according to a CMS Operation and



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Maintenance Plan (CMS O&M) that will be submitted to the Department for review and approval. The CMS O&M plan will be updated as necessary and any changes shall also be submitted to the Department for approval.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 7.0 pH units

Upper Permit Limit: 8.0 pH units

Monitoring Frequency: CONTINUOUS

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 13: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 13.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: E-WCST1

Emission Unit: C-RSH01

Process: F01 Emission Source: 00282

Emission Unit: P-DIG01

Process: E02

Emission Unit: C-ARB01

Process: N07

Emission Unit: U-LDG01 Emission Point: 25A01

Emission Unit: C-ARB01

Process: N05 Emission Source: N0222

Emission Unit: C-ARB01

Process: N05 Emission Source: N0322

Emission Unit: U-LDG01

Process: P01

Emission Unit: U-LDG01

Process: P03

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Emission Unit: C-ARB01

Process: N04

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 13.2:**

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 request from the Department.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Emissions from a Single device through multiple emission points**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(b)**

**Item 14.1:**

Where air contaminants from a single device or contrivance are emitted to the outdoor atmosphere through more than one emission point, the sum of the emissions from all such emission points shall not exceed the quantity that would be permitted if said emissions were through a single emission point

**Condition 15: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 15.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-NOD01

Process: G01

Emission Source: 01580

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Emission Unit: D-ROS01

Emission Unit: U-LDG01  
Process: P01

Emission Unit: U-LDG01  
Process: P03

Emission Unit: D-ROS02

Emission Unit: P-OT001  
Process: A03

Emission Unit: C-ARB01  
Process: N04

Emission Unit: C-ARB01  
Process: N07

Emission Unit: C-ARB01  
Process: N10

Emission Unit: C-ARB01  
Process: N05                      Emission Source: N0222

Emission Unit: C-ARB01  
Process: N05                      Emission Source: N0322

Emission Unit: E-WCST1

Emission Unit: C-RSH01  
Process: F01

Emission Unit: P-DIG01  
Process: E02

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

**Item 15.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source,



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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.

Upper Permit Limit: 20.0 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 16: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 16.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: C-ARB01

Process: N05

Emission Unit: C-ARB01

Process: N07

Emission Unit: C-RSH01

Emission Unit: W-WTR01

Emission Unit: E-WCST1

Process: J04

Emission Unit: E-WCST1

Process: J01

Emission Unit: E-WCST1

Process: J02

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 16.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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**Monitoring Description:**

The emission rate potential of Volatile Organic Compounds (VOCs) shall remain less than 3 pounds per hour per emission point. 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. The department reserves the right to perform or require the performance of stack testing to show compliance with the limit.

Upper Permit Limit: 3.0 pounds per hour

Reference Test Method: EPA Method 25

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Equipment Specifications for Cold Cleaning Batch**

**Degreasing**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 226**

**Item 17.1:**

**A. Equipment specifications:**

1. A cover shall be provided which can be operated easily.
2. The drainage facility shall be internal (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 0.7, or a water cover where the solvent is insoluble in and heavier than water, where the solvent being used has a vapor pressure greater than 33mm Hg at 38°C (100°F) or where the solvent is heated above 50°C (120°F)

**B. Operating requirements:**

1. Clean parts shall be drained at least 15 seconds or until dripping ceases.

**C. General requirements:**

No person shall conduct solvent metal cleaning unless:

1. Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
2. Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions.
3. Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds.
4. Equipment covers are closed when the solvent metal cleaning unit is not in service.
5. A record of solvent consumption shall be maintained for each year and made available to the



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commissioner or his representative upon request.

**Condition 1-6: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 227-2**

**Replaces Condition(s) 18**

**Item 1-6.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Reynolds Metals will maintain compliance with their existing emissions cap for Nitrogen Oxides as identified in their Nitrogen Oxides RACT plan submitted to NYSDEC on October 27, 1994. Calculations of NOx emission shall be made monthly. Annual NOx emissions rolled monthly shall be reported on a semi-annual calendar basis.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 198000 pounds per year

Reference Test Method: EPA RM 7E

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-7: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 257-3**

**Replaces Condition(s) 19**

**Item 1-7.1:**

The Compliance Certification activity will be performed for the Facility.

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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: AMBIENT AIR MONITORING

Monitoring Description:

Standard for suspended particulates. (a) 24-hour standard. For any 24-hour period, the average concentration shall not exceed 250  $\mu\text{g}/\text{m}^3$  more than once a year. (Applicable in all levels.)

(b) Annual standard.. During any 12 consecutive months, the geometric mean of the 24-hour average concentrations shall not exceed:

Level III 65  $\mu\text{g}/\text{m}^3$

(c) 30-day standard. During any 30 consecutive days, the arithmetic mean of the 24hour average concentrations, at any location, shall not exceed:

Level III 115  $\mu\text{g}/\text{m}^3$

(d) 60-day standard. During any 60 consecutive days, the arithmetic mean of the 24-hour average concentrations, at any location, shall not exceed:

Level III 95  $\mu\text{g}/\text{m}^3$

(e) 90-day standard. During any 90 consecutive days, the arithmetic mean of the 24-hour average concentrations, at any location, shall not exceed:

Level III 90  $\mu\text{g}/\text{m}^3$

(f) The standards in subdivisions (c), (d) and (e) of this section are intended for enforcement purposes, and monitoring will be performed only as required in a particular area. For prediction purposes, prediction of conformity with the annual geometric mean standard shall be sufficient to demonstrate predicted conformity with these standards.

Upper Permit Limit: 250 micrograms per cubic meter



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Reference Test Method: High volume sampling  
Monitoring Frequency: MONTHLY  
Averaging Method: 24-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 20: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 257-8**

**Item 20.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 068188-85-2 FLUORIDES

**Item 20.2:**

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.

The facility shall continue to monitor total fluoride forage levels as set forth in the Work/Quality Assurance Project Plan- Sampling and Analysis for Fluoride in Vegetation dated May 5, 1999.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING



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Facility DEC ID: 6405800024

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 21: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 52.21, Subpart A**

**Item 21.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 21.2:**

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 MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-8: General Provisions**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63, Subpart A**

**Item 1-8.1:**

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 22: Incorporation by Reference**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.841, Subpart LL**

**Item 22.1:**

(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

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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 23: Compliance Provisions - Test Plan**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 23.1:**

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;

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

(8) Procedures for establishing the frequency of testing to ensure that at least one run is performed before the 15th of the month, at least one run is performed after the 15th of the month, and that there are at least 6 days between two of the runs during the month, or that secondary emissions are measured according to an alternate schedule satisfactory to the applicable regulatory authority.

**Condition 24: Compliance Provisions - Initial Performance Test**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 24.1:**

Following approval of the site-specific test plan, the owner or operator shall conduct an initial performance test during the first month following the compliance date in accordance with the procedures in 40 CFR Part 63.847(d). If a performance test has been conducted on the primary control system for potlines or for the anode bake furnace within the 12 months prior to the compliance date, the results of that performance test may be used to determine initial compliance.

**Condition 25: Reference test methods for TF and POM emissions**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.849(a), Subpart LL**

**Item 25.1:**

The owner/operator shall use the following reference methods to determine compliance with the applicable emission limits for TF and POM emissions:

- 1) Method 1 in Appendix A to part 60 for sample and velocity traverses;
- 2) Method 2 in Appendix A to part 60 for velocity and volumetric flow rate;
- 3) Method 3 in Appendix A to part 60 for gas analysis;
- 4) Method 13A or 13B in Appendix A to part 60, or an approved alternative, for the concentration of TF where stack or duct emission are sampled;
- 5) Method 13A or 13B and Method 14 or 14A in Appendix A to part 60 or an approved alternative method for the concentration of TF where emissions are sampled from roof monitors not employing wet roof scrubbers;
- 6) Method 315 in Appendix A to part 63 or an approved alternative method for the concentration of POM where stack or duct emissions are sampled; and
- 7) Method 315 in Appendix A to part 63 and Method 14 in Appendix A to part 60 or an approved alternative method for the concentration of POM where emissions are sampled from roof monitors not employing wet roof scrubbers.

**Condition 26: Alternative test methods for TF or POM emissions**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.849(e), Subpart LL**



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**Item 26.1:**

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 1-9: Applicability**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1500(b), Subpart RRR**

**Item 1-9.1:**

The requirements of this subpart apply to the following affected sources, located at a secondary aluminum production facility that is a major source of hazardous air pollutants (HAPs) as defined in 40 CFR Part 63.2:

- (1) Each new and existing aluminum scrap shredder;
- (2) Each new and existing thermal chip dryer;
- (3) Each new and existing scrap dryer/delacquering kiln/decoating kiln;
- (4) Each new and existing group 2 furnace;
- (5) Each new and existing sweat furnace;
- (6) Each new and existing dross-only furnace;
- (7) Each new and existing rotary dross cooler; and
- (8) Each new and existing secondary aluminum processing unit.

**Condition 1-10: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-10.1:**

The Compliance Certification activity will be performed for the facility:

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The Compliance Certification applies to:

Emission Unit: E-WCST1  
Process: J01                      Emission Source: 0120G

Emission Unit: E-WCST1  
Process: J01                      Emission Source: 0220G

Emission Unit: E-WCST1  
Process: J01                      Emission Source: 0320G

Emission Unit: E-WCST1  
Process: J01                      Emission Source: 0420G

Emission Unit: E-WCST1  
Process: J01                      Emission Source: 0520G

Emission Unit: E-WCST1  
Process: J04                      Emission Source: 00120

Emission Unit: E-WCST1  
Process: J04                      Emission Source: 00220

Emission Unit: E-WCST1  
Process: J04                      Emission Source: 00320

Emission Unit: E-WCST1  
Process: J04                      Emission Source: 01920

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

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, Alcoa must comply with the emission limits calculated using the equations for PM and HCl in paragraphs k(1) and k(2) of §63.1505(k) for each secondary aluminum processing unit. Monitoring reports shall be submitted semi-annually.

The OM&M plan has been approved and any subsequent changes will need Departmental approval. The SAPU consists of the attached emission sources.

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Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-11: Operating requirements - Corrective Action**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1506(p), Subpart RRR**

**Item 1-11.1:**

When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

**Condition 1-12: Monitoring and Compliance Requirements - OM&M Plan**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-12.1:**

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:

(1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.



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- (2) A monitoring schedule for each affected source and emission unit.
- (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR Part 63.1505.
- (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
  - (i) Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
  - (ii) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in 40 CFR Part 63 Subpart A.
- (5) Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of 40 CFR §63.1510, including:
  - (i) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
  - (ii) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (8) Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR §63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.

**Condition 1-13: Site-specific requirements for secondary aluminum processing units**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-13.1:**

- (1) An owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR Part 63.1510(b), 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



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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 1-14: Initial Performance Test**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-14.1:**

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.

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(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 1-15: Test Methods**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-15.1:**

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 1-16: Secondary Aluminum Notifications**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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**Applicable Federal Requirement: 40CFR 63.1515, Subpart RRR**

**Item 1-16.1:**

(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 1-17: Secondary Aluminum MACT Reports**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1516, Subpart RRR**

**Item 1-17.1:**

**Startup, shutdown, and malfunction plan/reports:** The owner or operator must develop and implement 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.



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**Item 1-17.2:**

**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 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.

**Item 1-17.3:**

**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.

**Condition 1-18: Secondary Aluminum MACT Recordkeeping**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1517, Subpart RRR**

**Item 1-18.1:**

(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 1-19: Accidental release provisions.**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 68**

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**Replaces Condition(s) 27**

**Item 1-19.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866  
ATTN: Accidental Release Program contact

**Condition 27: Accidental release provisions.  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 68**

**Item 27.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit (if not previously submitted) one of the following if such quantities are present at the time of permit issuance:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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



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ATTN: Accidental Release Program contact

**Condition 28: Recycling and Emissions Reduction**  
Effective between the dates of 09/01/2002 and 09/01/2007

**Applicable Federal Requirement: 40CFR 82, Subpart F**

**Item 28.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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

**Condition 29: Emission Point Definition By Emission Unit**  
Effective between the dates of 09/01/2002 and 09/01/2007

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 29.1(From Mod 1):**

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

Emission Unit: E-WCST1

Emission Point: 20002  
Height (ft.): 53                      Length (in.): 48                      Width (in.): 12  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20

Emission Point: 20003  
Height (ft.): 53                      Length (in.): 48                      Width (in.): 12  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20

Emission Point: 20004  
Height (ft.): 53                      Length (in.): 48                      Width (in.): 12  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20

Emission Point: 20010  
Height (ft.): 78                      Length (in.): 31                      Width (in.): 31  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20G

Emission Point: 20011  
Height (ft.): 78                      Length (in.): 31                      Width (in.): 31  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20G

**Item 29.2(From Mod 0):**

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

Emission Unit: B-OIL01



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**Facility DEC ID: 6405800024**

Emission Point: 00C1B  
Height (ft.): 52 Diameter (in.): 38  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 00C2B  
Height (ft.): 52 Diameter (in.): 44  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 00C3B  
Height (ft.): 50 Diameter (in.): 42  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

**Item 29.3(From Mod 0):**

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

Emission Unit: C-ARB01

Emission Point: 22001  
Height (ft.): 94 Diameter (in.): 24  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 22003  
Height (ft.): 95 Diameter (in.): 25  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 22004  
Height (ft.): 121 Diameter (in.): 32  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 22A01  
Height (ft.): 56 Diameter (in.): 1  
Building: 22A

Emission Point: 22A09  
Height (ft.): 68 Diameter (in.): 42  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22A

Emission Point: 22B01  
Height (ft.): 27 Diameter (in.): 6  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22B

Emission Point: 22C01  
Height (ft.): 27 Diameter (in.): 6  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22C

Emission Point: 22D01  
Height (ft.): 64 Diameter (in.): 4  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22D



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Emission Point: 22E01  
Height (ft.): 64 Diameter (in.): 4  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22E

Emission Point: 22F01  
Height (ft.): 27 Diameter (in.): 6  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22F

Emission Point: 22F02  
Height (ft.): 4 Diameter (in.): 4  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22F

Emission Point: 22G01  
Height (ft.): 3 Diameter (in.): 12  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22G

Emission Point: 22G02  
Height (ft.): 15 Diameter (in.): 8  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 22G

**Item 29.4(From Mod 0):**

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

Emission Unit: C-RSH01

Emission Point: 82001  
Height (ft.): 34 Diameter (in.): 22  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 82002  
Height (ft.): 30 Diameter (in.): 24  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 82

**Item 29.5(From Mod 0):**

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

Emission Unit: E-WCST1

Emission Point: 20013  
Height (ft.): 46 Diameter (in.): 0  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 20G

Emission Point: 20014  
Height (ft.): 22 Diameter (in.): 24  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 20

Emission Point: 20015



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Height (ft.): 23                      Diameter (in.): 12  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20G

Emission Point: 20018  
Height (ft.): 25                      Diameter (in.): 16  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20

**Item 29.6(From Mod 0):**

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

Emission Unit: P-DIG01

Emission Point: 85002  
Height (ft.): 245                      Length (in.): 48                      Width (in.): 43

**Item 29.7(From Mod 0):**

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

Emission Unit: P-OT001

Emission Point: 20B00  
Height (ft.): 39                      Diameter (in.): 26  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 20

Emission Point: 20F02  
Height (ft.): 27                      Diameter (in.): 2  
  
Building: 20

Emission Point: 77A01  
Height (ft.): 146                      Diameter (in.): 237  
  
Building: 77

Emission Point: 77A02  
Height (ft.): 146                      Diameter (in.): 237  
  
Building: 77

Emission Point: PRV51  
Height (ft.): 48                      Diameter (in.): 0  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 51

Emission Point: PRV52  
Height (ft.): 48                      Diameter (in.): 0  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 52

Emission Point: PRV53  
Height (ft.): 48                      Diameter (in.): 0  
NYTMN (km.): 4981.223    NYTME (km.): 518.529    Building: 53



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Emission Point: PRV54  
Height (ft.): 48 Diameter (in.): 0  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 54

Emission Point: PRV55  
Height (ft.): 48 Diameter (in.): 0  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 55

Emission Point: PRV56  
Height (ft.): 48 Diameter (in.): 0  
NYTMN (km.): 4981.223 NYTME (km.): 518.529 Building: 56

**Item 29.8(From Mod 0):**

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

Emission Unit: U-LDG01

Emission Point: 25A01  
Height (ft.): 44 Diameter (in.): 19  
NYTMN (km.): 4981.223 NYTME (km.): 518.529

Emission Point: 25A02  
Height (ft.): 44 Diameter (in.): 19

**Condition 30: Process Definition By Emission Unit  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 30.1(From Mod 1):**

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

Emission Unit: B-OIL01  
Process: I01 Source Classification Code: 1-02-006-02  
Process Description:

This process is for the combustion of natural gas to produce steam for heating and cooling purposes throughout the plant. Each of the plant's three boilers has the capability to fire natural gas.

Emission Source/Control: 0122H - Combustion

Emission Source/Control: 0222H - Combustion

Emission Source/Control: 0322H - Combustion

**Item 30.2(From Mod 1):**

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

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Emission Unit: B-OIL01

Process: I03

Source Classification Code: 1-02-004-01

Process Description:

This process is for the combustion of #6 fuel oil to produce steam for heating and cooling purposes throughout the plant. Boilers #1 and 3 have the capability to fire #6 fuel oil.

Emission Source/Control: 0222H - Combustion

Emission Source/Control: 0322H - Combustion

**Item 30.3(From Mod 1):**

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

Emission Unit: C-ARB01

Process: N03

Source Classification Code: 3-03-003-31

Process Description:

This process is for a 9.8 mmBTU/hr HTM burner while firing #6 fuel oil. The burner is used to heat HTM oil. HTM oil is used in non-contact piping as a heat transfer medium to maintain the operating temperatures for the coal tar pitch storage and transfer operations, and to maintain the operating temperatures of the paste mixers in the Carbon Plant.

Emission Source/Control: 00122 - Process

**Item 30.4(From Mod 1):**

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

Emission Unit: E-WCST1

Process: J01

Source Classification Code: 3-03-001-99

Process Description:

THIS PROCESS INCLUDES FURNACES 7 AND 8, THEIR ASSOCIATED SNIF UNITS, AND THE GAS HOMOGENIZING FURNACE. FURNACES 7 AND 8, AND THE SNIF UNITS USE REACTIVE FLUX.

Emission Source/Control: 0120G - Process

Emission Source/Control: 0220G - Process

Emission Source/Control: 0320G - Process

Emission Source/Control: 0420G - Process



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Emission Source/Control: 0520G - Process

**Item 30.5(From Mod 1):**

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

Emission Unit: E-WCST1

Process: J02

Source Classification Code: 3-03-001-99

Process Description: This process includes each of the cast house saws.

Emission Source/Control: 00520 - Process

Emission Source/Control: 00620 - Process

Emission Source/Control: 0620G - Process

**Item 30.6(From Mod 1):**

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

Emission Unit: E-WCST1

Process: J04

Source Classification Code: 3-03-001-99

Process Description:

THIS PROCESS INCLUDES FURNACES 2,3 AND 4,  
AND THE DEGASSING UNIT FOR FURNACE NUMBER  
4. THE ALCAN DEGASSING UNIT USES ONLY  
ARGON GAS. FURNACES 2,3 AND 4 USE REACTIVE  
FLUX.

Emission Source/Control: 00120 - Process

Emission Source/Control: 00220 - Process

Emission Source/Control: 00320 - Process

Emission Source/Control: 01820 - Process

Emission Source/Control: 01920 - Process

**Item 30.7(From Mod 1):**

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

Emission Unit: P-DIG01

Process: E02

Source Classification Code: 3-03-001-99

Process Description:

This process represents the cathode digging process. The cathode digging process involves several digging and skimming operations to remove the spent potliner from the cathode shell. Spent potliner is then placed in proper containers for shipment.

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Emission Source/Control: E4685 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 46185 - Process

**Item 30.8(From Mod 1):**

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

Emission Unit: P-OT001

Process: A02

Source Classification Code: 3-03-001-02

Process Description:

This process is for the pots venting to the fume control system.

Emission Source/Control: B5156 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: C5156 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: E5152 - Control  
Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5354 - Control  
Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5556 - Control  
Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: 00051 - Process

Emission Source/Control: 00152 - Process

Emission Source/Control: 00153 - Process

Emission Source/Control: 00154 - Process

Emission Source/Control: 00155 - Process

Emission Source/Control: 00156 - Process

Emission Source/Control: 05152 - Process

Emission Source/Control: 05354 - Process

Emission Source/Control: 05556 - Process

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Emission Source/Control: PRVNT - Process

**Item 30.9(From Mod 1):**

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

Emission Unit: P-OT001

Process: A03

Source Classification Code: 3-03-001-99

Process Description:

This process consists of cruce augering and cleaning and cruce lid cleaning.

Emission Source/Control: L2002 - Control

Control Type: CENTRIFUGAL

Emission Source/Control: 01320 - Process

Emission Source/Control: 01420 - Process

**Item 30.10(From Mod 1):**

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

Emission Unit: P-OT001

Process: A05

Source Classification Code: 3-03-001-01

Process Description: This process consists of cathode baking.

Emission Source/Control: B5156 - Control

Control Type: WET SCRUBBER

Emission Source/Control: C5156 - Control

Control Type: WET SCRUBBER

Emission Source/Control: E5152 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5354 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5556 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: 05152 - Process

Emission Source/Control: 05354 - Process

Emission Source/Control: 05556 - Process

**Item 30.11(From Mod 1):**

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

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Emission Unit: P-OT001

Process: A06

Source Classification Code: 3-03-001-99

Process Description: This process consists of pot cut-out.

Emission Source/Control: B5156 - Control

Control Type: WET SCRUBBER

Emission Source/Control: C5156 - Control

Control Type: WET SCRUBBER

Emission Source/Control: E5152 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5354 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: E5556 - Control

Control Type: DRY SPRAY ABSORPTION

Emission Source/Control: 05152 - Process

Emission Source/Control: 05354 - Process

Emission Source/Control: 05556 - Process

**Item 30.12(From Mod 0):**

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

Emission Unit: A-NOD01

Process: G01

Source Classification Code: 3-03-003-99

Process Description:

This process is for the channel cooling area. As the channels are removed from the pots, they are placed on a portable rack and allowed to cool prior to reforming in the channel press. Currently, this process is adjacent to the Anode Pin Room, but on occasion it may be done in other areas of the facility.

Emission Source/Control: 01580 - Process

**Item 30.13(From Mod 0):**

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

Emission Unit: C-ARB01

Process: N02

Source Classification Code: 3-03-003-31

Process Description:

This process is for a 9.8 mmBTU/hr HTM burner while



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firing natural gas. The burner is used to heat HTM oil. HTM oil is used in non-contact piping as a heat transfer medium to maintain the operating temperatures for the coal tar pitch storage and transfer operations, and to maintain the operating temperatures of the past mixers in the Carbon Plant.

Emission Source/Control: 00122 - Process

**Item 30.14(From Mod 0):**

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

Emission Unit: C-ARB01

Process: N04

Source Classification Code: 3-03-003-12

Process Description:

This process is the storage of petroleum coke in two 2,000 ton petroleum coke storage silos.

Emission Source/Control: 00522 - Process

Emission Source/Control: 00622 - Process

**Item 30.15(From Mod 0):**

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

Emission Unit: C-ARB01

Process: N05

Source Classification Code: 3-03-003-12

Process Description:

This process includes the miscellaneous petroleum coke handling and processing operations in the anode portion of the Carbon Plant. Petroleum coke is transferred from the coke silos to the Carbon Plant where it undergoes a number of handling and processing operations, including sorting, crushing (via the anode ball mill), weighing, and mixing. Two baghouses are used to control particulate matter emissions from this process - one for the anode ball mill and one for the miscellaneous handling equipment.

Emission Source/Control: N0222 - Control

Control Type: FABRIC FILTER

Emission Source/Control: N0322 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 01022 - Process

Emission Source/Control: 01222 - Process

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**Item 30.16(From Mod 0):**

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

Emission Unit: C-ARB01

Process: N07

Source Classification Code: 3-03-003-12

Process Description:

This process includes the carbon paste mixers and the coal tar pitch scales. The carbon paste mixers are used to mix and weigh the appropriate ratios of petroleum coke with the coal tar pitch to form the anode paste. The anode paste is then dumped into portable boxes for transfer into the potrooms. Both the coal tar pitch scales and the carbon paste mixers are vented to a dry coke scrubber to remove particulate matter and coal tar pitch volatiles.

Emission Source/Control: N0522 - Control

Control Type: MOVING BED DRY SCRUBBER

Emission Source/Control: 01322 - Process

Emission Source/Control: 01422 - Process

**Item 30.17(From Mod 0):**

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

Emission Unit: C-ARB01

Process: N10

Source Classification Code: 3-03-003-31

Process Description:

This process includes the coal tar pitch and the unloading operations. Coal tar pitch (pitch) is delivered to the site by rail in tank cars and is transferred to storage tanks to maintain an on-site inventory. The rail tank cars have an internal dip-pipe suitable for connection to a heated, flexible-top unloading pipe, a nitrogen gas connection, and a vent line connection. The unloading pipe will be coupled to the two 120,000 gallon pitch storage tanks, the nitrogen gas line will be coupled to a liquid nitrogen system with an evaporator for producing medium pressure nitrogen gas, and the vent line will be connected to the closest pitch tank. Gaseous nitrogen will be admitted into the tank car forcing the transfer of liquid pitch to the storage tank.

Emission Source/Control: 00322 - Process

Emission Source/Control: 00422 - Process



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Emission Source/Control: 00722 - Process

Emission Source/Control: 01522 - Process

**Item 30.18(From Mod 0):**

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

Emission Unit: C-RSH01

Process: F01

Source Classification Code: 3-03-003-31

Process Description:

The crusher building is used to crush spent carbon, scrap carbon paste, pot strippings and basement ore. These materials are then recycled into the Carbon Plant and potrooms. The materials to be crushed may be treated with various wetting agents to minimize dust generation during the crushing process. A baghouse is used to capture particulate emissions from the crushing operations.

Emission Source/Control: F0182 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00182 - Process

Emission Source/Control: 00282 - Process

**Item 30.19(From Mod 0):**

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

Emission Unit: D-ROS01

Process: Z01

Source Classification Code: 3-03-001-99

Process Description:

This process is for the dross storage room. Dross, a mixture of various metal oxides, is generated from furnace skimmings. Dross is stored in a room prior to shipment to an outside vendor for reclamation.

Emission Source/Control: 01520 - Process

**Item 30.20(From Mod 0):**

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

Emission Unit: D-ROS02

Process: Z02

Source Classification Code: 3-04-001-07

Process Description:

This process is for the dross cooling areas. After dross is removed from the furnace, it is allowed to cool prior to being placed into the dross storage room.

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Emission Source/Control: 01720 - Process

**Item 30.21(From Mod 0):**

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

Emission Unit: P-AINO1

Process: Q01

Source Classification Code: 4-02-001-01

Process Description:

This process is for the facility paint shop. The paint shop is used primarily for maintenance painting, including vehicle touch-up and repair, furnace refinishing, storage tank refinishing, etc. Paint is applied manually and with spray guns.

Emission Source/Control: 00131 - Process

**Item 30.22(From Mod 0):**

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

Emission Unit: P-ARTW1

Process: PW1

Source Classification Code: 4-01-003-36

Process Description:

This process consists of batch cold cleaning degreasers in use plant wide.

Emission Source/Control: PART1 - Process

**Item 30.23(From Mod 0):**

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

Emission Unit: U-LDG01

Process: P01

Source Classification Code: 3-03-001-04

Process Description:

This process includes unloading and transfer operations for alumina ore, petroleum coke, and aluminum fluoride. The alumina hopper, elevator, and transfer point in the ore gallery are vented to a baghouse as is the coke operation.

Emission Source/Control: P0125 - Control

Control Type: FABRIC FILTER

Emission Source/Control: P0225 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0125A - Process

Emission Source/Control: 0125B - Process

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Emission Source/Control: 0125C - Process

Emission Source/Control: 0125D - Process

**Item 30.24(From Mod 0):**

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

Emission Unit: U-LDG01

Process: P03

Source Classification Code: 3-03-001-04

Process Description:

This process includes the alumina and coke conveyance systems and the associated transfer points to their storage silos. Baghouses are employed to control particulate emissions from this process.

Emission Source/Control: P0125 - Control

Control Type: FABRIC FILTER

Emission Source/Control: P0225 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00125 - Process

Emission Source/Control: 00225 - Process

Emission Source/Control: 00325 - Process

Emission Source/Control: 0125A - Process

Emission Source/Control: 0125B - Process

Emission Source/Control: 0125C - Process

Emission Source/Control: 0125D - Process

**Item 30.25(From Mod 0):**

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

Emission Unit: W-WTR01

Process: WW1

Source Classification Code: 5-03-007-02

Process Description:

This process consists of water and wastewater treatment operations at the facility, including, but not limited to, ponds, lagoons, settling tanks, wastewater treatment operations, etc. This unit primarily contains fugitive emissions.



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**Facility DEC ID: 6405800024**

Emission Source/Control: WWT01 - Process

**Condition 1-20: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Replaces Condition(s) 38**

**Item 1-20.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-OIL01

**Item 1-20.2:**

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: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 31: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 31.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-OIL01

**Item 31.2:**

Compliance Certification shall include the following monitoring:

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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.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 32: Corrective Action**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 227-1.6(a)**

**Item 32.1:**

This Condition applies to Emission Unit: B-OIL01

**Item 32.2:**

Any facility found in violation of the provisions of this Part shall not cause, permit, or allow the operation of the affected stationary combustion installation 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.

**Condition 33: Corrective Action**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 227-1.6(b)**

**Item 33.1:**

This Condition applies to Emission Unit: B-OIL01

**Item 33.2:**

The commissioner may seal such stationary combustion installation so as to prevent any operation if the conditions of paragraphs 6 NYCRR Part 227-1.6(a)(1)-(3) are not met within the time provided by the order of final determination issued in the case of the violation.

**Condition 34: Corrective Action**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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**Applicable Federal Requirement: 6NYCRR 227-1.6(c)**

**Item 34.1:**

This Condition applies to Emission Unit: B-OIL01

**Item 34.2:**

No person shall cause, permit, or allow the operation of any affected stationary combustion installation sealed by the commissioner in accordance with 6 NYCRR Part 227-1.6.

**Condition 35: Corrective Action**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 227-1.6(d)**

**Item 35.1:**

This Condition applies to Emission Unit: B-OIL01

**Item 35.2:**

No person except the commissioner or his representatives shall remove, tamper with or destroy any seal affixed to any stationary combustion installation in accordance with 6 NYCRR Part 227-1.6.

**Condition 36: General Provisions**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 227-1.7**

**Item 36.1:**

This Condition applies to Emission Unit: B-OIL01

**Item 36.2:**

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

**Condition 37: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 225-1.2(a)(2)**

**Item 37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-OIL01



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Permit ID: 6-4058-00024/00077

Facility DEC ID: 6405800024

Process: I03

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person will sell, offer for sale, purchase or use any distillate oil fuel which contains sulfur in a quantity exceeding the following limitation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 6 OIL

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 39: Sampling, compositing, and analysis of fuel samples  
Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 39.1:**

This Condition applies to Emission Unit: B-OIL01

Process: I03

**Item 39.2:**

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 1-21: Compliance Certification  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Replaces Condition(s) 40**

**Item 1-21.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-OIL01

Process: I03

Emission Source: 0222H

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**Facility DEC ID: 6405800024**



Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-21.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emission 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) All records shall be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-22: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Replaces Condition(s) 41**

**Item 1-22.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-OIL01

Process: I03

Emission Source: 0322H

Regulated Contaminant(s):

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CAS No: 0NY075-00-0 PARTICULATES

**Item 1-22.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emission 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) All records shall be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 42: Emission Limits for Existing Sources - Paste Production Plants**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.843(b), Subpart LL**

**Item 42.1:**

This Condition applies to Emission Unit: C-ARB01

**Item 42.2:**

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



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**Facility DEC ID: 6405800024**

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 43: Initial compliance provisions for paste production plants  
Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 43.1:**

This Condition applies to Emission Unit: C-ARB01

**Item 43.2:**

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 44: Selection of monitoring parameters - paste production  
plants  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.847(h)(2), Subpart LL**

**Item 44.1:**

This Condition applies to Emission Unit: C-ARB01

**Item 44.2:**

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). For a paste production plant, the owner/operator shall specify and provide the basis or rationale for selecting parameters to be monitored and the associated operating limits for the emission control device.

**Condition 45: Selection of monitoring parameters - redetermining  
operating limits  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.847(h)(3), Subpart LL**

**Item 45.1:**

This Condition applies to Emission Unit: C-ARB01

**Item 45.2:**

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 New York State DEC to change the applicable limit(s). The redetermined limits shall become effective upon approval by the New York State DEC.

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**Condition 46: Compliance Certification**

Effective between the dates of 09/01/2002 and 09/01/2007

**Applicable Federal Requirement: 40CFR 63.850(e)(4), Subpart LL**

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: C-ARB01

**Item 46.2:**

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) 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 §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).

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-23: Compliance Certification**

Effective between the dates of 06/01/2004 and 09/01/2007

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

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**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**



**Replaces Condition(s) 47**

**Item 1-23.1:**

The Compliance Certification activity will be performed for:

Emission Unit: C-ARB01

Process: N03

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-23.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The source owner operator shall maintain records of the sulfur content of the #6 fuel oil burned at emission source 0022A. These records shall be comprised of supplier performed chemical analysis for each delivery of #6 fuel oil. Records shall be kept for a period of 5 years and reported semi-annually.

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-24: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 52.21, Subpart A**

**Replaces Condition(s) 48**

**Item 1-24.1:**

The Compliance Certification activity will be performed for:

Emission Unit: C-ARB01

Process: N03

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

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**Item 1-24.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The amount of #6 oil burned in the HTM burner (emission source 0022A) shall not exceed 232,000 gallons during any 12 month period. Once the #6 oil burner system is properly operational, a fuel flow meter shall be installed and properly maintained to verify the fuel usage. Fuel oil usage shall be recorded monthly and the rolling 12 month total shall be reported semi-annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 49: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: C-ARB01

Process: N10

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility owner has demonstrated that this process operates in compliance with the VOC RACT provisions of 6 NYCRR Part 212.10(c)(4). Facility owner shall operate and maintain the enclosed nitrogen purge coal tar pitch unloading system in such a manner as to achieve an 81% overall removal efficiency of VOC.

If requested by the Department facility owner will be

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required to demonstrate that this process operates in compliance with the overall removal efficiency contained in this condition.

Parameter Monitored: VOC

Lower Permit Limit: 81 percent reduction by weight

Reference Test Method: EPA Method 18 or 25

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-25: SAPU emission limits for individual emission units**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1505(k)(4), Subpart RRR**

**Item 1-25.1:**

This Condition applies to Emission Unit: E-WCST1

**Item 1-25.2:**

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 1-26: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1506(b), Subpart RRR**

**Item 1-26.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Alcoa must provide and maintain easily visible labels

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posted at each group one furnace, group 2 furnace, in-line fluxer that identifies the applicable emission limits and means of compliance, including:

- 1) The type of affected source or emission unit.
- 2) The applicable operational standard(s) and control method(s). This includes , but is not limited to, the type of charge to be used for the furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

Alcoa must certify compliance at least semi-annually in accordance with the latest Department approved OM&M Plan.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-27: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-27.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total reactive flux injection rate.

These requirements apply to the owner or operator of a group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer. Alcoa must

- 1) Install, calibrate, operate and maintain a device to

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continuously measure and record the weight of the gaseous or liquid reactive flux injected to each affected source or emission unit.

i) The monitoring system must record the weight for each 15 minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.

ii) The accuracy of the weight measuring device must be +/- 1 percent of the weight of the reactive component of the flux being measured.

iii) Alcoa must verify the calibration of the weight measuring device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six months.

2) Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in §63.1512(o).

3) Record, for each 15- minute block period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:

i) Gaseous or liquid reactive flux other than chlorine; and

ii) Solid reactive flux.

4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in §63.1512(o).

5) The owner or operator of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for an approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test.

Alcoa shall monitor and operate according to these requirements as approved in the Site Specific Monitoring Plan and the Operation, Maintenance and Monitoring Plan.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-28: Calculation of Secondary Aluminum Processing Unit Emissions**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-28.1:**

This Condition applies to Emission Unit: E-WCST1

**Item 1-28.2:**

Except as provided in paragraph 40 CFR Part 63.1510(u), the owner or operator must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F as applicable for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the owner or operator must:

(1) Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in paragraph (e) of this section. If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.

(2) Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds.

(3) Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.

(4) Compute the 24-hour daily emission rate using the equation below:

$$E_{day} = \frac{\sum_{i=1}^n (T_i \times ER_i)}{\sum_{i=1}^n T_i}$$

Where,



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$E_{\text{day}}$  = The daily PM, HCl, and/or D/F emission rate for the secondary aluminum processing unit for the 24-hour period;

$T_i$  = The total amount of feed, or aluminum produced, for emission unit  $i$  for the 24-hour period (tons);

$ER_i$  = The measured emission rate for emission unit  $i$  as determined in the performance test (lb/ton or  $\mu\text{g}/\text{Mg}$  of feed/charge); and

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

(5) Calculate and record the 3-day, 24-hour rolling average of PM each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

**Condition 1-29: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-29.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Regulated Contaminant(s):

CAS No: 007647-01-0    HYDROGEN CHLORIDE

CAS No: 0NY075-00-0    PARTICULATES

**Item 1-29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In the site specific monitoring (SS&M) plan required by §63.1510(o), the owner of a group 1 furnace 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 emissions 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 one furnace processes only clean charge.

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3) The owner 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 is not required to conduct PM and HCl emission test.

The Department has approved the Reynolds (Alcoa East) plant's SS&M plan. Any subsequent changes will be reviewed as necessary.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-30: Performance Test/Compliance Demonstration Requirements and Procedures - In-line fluxer**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1512(h)(1), Subpart RRR**

**Item 1-30.1:**

This Condition applies to Emission Unit: E-WCST1

**Item 1-30.2:**

The owner or operator must conduct a performance test to measure emissions of HCl and PM. If the in-line fluxer is equipped with an add-on control device, the emissions must be measured at the outlet of the control device. If the in-line fluxer uses no reactive flux materials, emission tests for PM and HCl are not required.

**Condition 1-31: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-31.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

CAS No: 0NY075-00-0 PARTICULATES

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**Item 1-31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Secondary Aluminum Processing Unit.

Alcoa must conduct performance tests as described in paragraphs j(1) through j(3) of §63.1512(j). The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl 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 §63.1510(t).

Initial testing has been completed and accepted.

Subsequent testing will be conducted as necessary in accordance with 40 CFR 63 Subpart RRR.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-32: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-32.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 1-32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Alcoa must use these procedures to establish an operating parameter value or range for the total reactive Chlorine flux injection rate.

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1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl test (and D/F test if applicable), determine and record the 15 minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for 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 the solid reactive flux using the following equation:

$$W_t = F_1 W_1 + F_2 W_2$$

Where:

$W_t$  = Total Chlorine usage, by weight;

$F_1$  = Fraction of gaseous or liquid flux that is Chlorine;

$W_1$  = Weight of reactive flux gas injected;

$F_2$  = Fraction of solid reactive chloride flux that is chlorine (e.g.,  $F = 0.75$  for magnesium chloride); and

$W_2$  = Weight of solid reactive flux;

4) Divide the weight of total chlorine usage ( $W_t$ ) for the three test runs by the recorded measurement of the total weight of feed for the three test runs;

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 from the Department.

The flux injection rate shall be monitored and reported according to the approved OM&M Plans.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-33: Incorporation by reference material**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1502(a), Subpart RRR**

**Item 1-33.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-33.2:**

The following material is incorporated by reference in the corresponding sections noted. The incorporation by reference (IBR) of certain publications listed in the rule will be approved by the Director of the Office of the Federal Register as of March 23, 2000 and consists of:

- Chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice," American Conference of Governmental Industrial Hygienists, (23rd Edition, 1998), IBR approved for §63.1506(c), and
- "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)

**Condition 1-34: Group 1 Furnace Dioxin/Furan Limit**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-34.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-34.2:**

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 µg of D/F TEQ per Mg (2.1 x 10<sup>-4</sup> 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.

**Condition 1-35: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-35.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

i) The owner or operator of a group 1 furnace must use the limits in this paragraph to determine the emission standards for a SAPU pursuant to §63.1505(k).

2) 0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge from a group 1 melting/holding furnace processing only clean charge at a secondary aluminum production facility that is a major source.

The owner or operator may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group one furnace, rather than on the basis of feed/charge.

Upper Permit Limit: 0.80 pounds per ton

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-36: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 1-36.2:**

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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.

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: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-37: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-37.2:**

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

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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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.01 pounds per ton

Reference Test Method: EPA RM 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-38: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1506(d), Subpart RRR**

**Item 1-38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or  $\mu\text{g/Mg}$  (gr/ton) of feed/charge must:

(1) Except as provided in paragraph (3) of this condition, install, calibrate, operate and maintain a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and

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(2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.

(3) The owner or operator may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:

(i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and

(ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.

(4) Feed/charge or aluminum production within SAPUs must be measured and recorded for each group 1 furnace and/or in-line fluxer.

(5) The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.

(6) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

(7) As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.



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The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-39: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J01

**Item 1-39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR Part 63.1506(b) are intact and legible.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-40: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J01

**Item 1-40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



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The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or  $\mu\text{g/Mg}$  (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

(1) The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.

(2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-41: Secondary aluminum processing unit compliance by individual emission unit demonstration  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-41.1:**

This Condition applies to Emission Unit: E-WCST1  
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**Item 1-41.2:**

As an alternative to the procedures in §63.1510(t), an owner/operator may demonstrate through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

**Condition 1-42: Site-specific test plan**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-42.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-42.2:**

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 1-43: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J01

**Item 1-43.2:**

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

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-44: Testing of Representative Emission Units**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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



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**Item 1-44.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-44.2:**

With the approval of the permitting authority, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:

- (1) The tested emission unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
- (2) The tested emission unit is subject to the same work practices and the emission units that it represents;
- (3) The tested emission unit is of the same design as the emission units that it represents;
- (4) The tested emission unit is tested under the highest load or capacity reasonably expected to occur for any of the emission units that it represents;
- (5) At least one of each different style of emission unit at the facility is tested; and
- (6) All add-on control devices are tested.

**Condition 1-45: Establishment of Monitoring and Operating Parameter Values  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-45.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-45.2:**

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.



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(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 1-46: Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-46.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-46.2:**

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 1-47: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J01

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

**Item 1-47.2:**

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



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§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 MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-48: Equations for Determining Compliance - PM, HCl and D/F emission limits**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-48.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J01

**Item 1-48.2:**

PM, HCl and D/F emission limits. Use Equation 7 to determine compliance with an emission limit for PM, HCl, and D/F:

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

Where,

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

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

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

K<sub>1</sub> = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and

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

**Condition 1-49: Notification of performance test date**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1515(a)(6), Subpart RRR**

**Item 1-49.1:**

This Condition applies to Emission Unit: E-WCST1  
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**Item 1-49.2:**

As required by §63.9(e) and (f), the owner/operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner/operator must notify EPA or



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NYSDEC 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.

**Condition 1-50: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-50.2:**

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

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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.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**Condition 1-51: Compliance Certification**

Effective between the dates of 06/01/2004 and 09/01/2007

**Applicable Federal Requirement: 40CFR 63.1516(b), Subpart RRR**

**Item 1-51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J01

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required by §63.10(e)(3), semiannual reports must be submitted 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 occurred during the reporting period, a report stating that no excess emissions occurred shall be submitted.

1) A report must be submitted if any of these conditions occur during a 6-month reporting period:

- The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour
- The corrective action specified in the OM&M plan for a continuous opacity monitoring deviation was not initiated within 1 hour
- The corrective action specified in the OM&M plan for visible emissions from an aluminum scrap shredder was not initiated within 1 hour
- An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate, fabric filter inlet temperature, etc.)
- An action taken during a start up, shutdown, or malfunction was not consistent with the procedures in the plan as described in §63.6(e)(3)
- An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR
- A deviation from the 3-day, 24-hour rolling average

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emission limit for a secondary aluminum processing unit

2) Each report must include any of the certifications listed in §63.1516(b)(2)(i)-(vi) which may be applicable.

3) 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.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-52: Incorporation by reference material**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1502(a), Subpart RRR**

**Item 1-52.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

**Item 1-52.2:**

The following material is incorporated by reference in the corresponding sections noted. The incorporation by reference (IBR) of certain publications listed in the rule will be approved by the Director of the Office of the Federal Register as of March 23, 2000 and consists of:

- Chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice," American Conference of Governmental Industrial Hygienists, (23rd Edition, 1998), IBR approved for §63.1506(c), and
- "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)

**Condition 1-53: Group 1 Furnace Dioxin/Furan Limit**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-53.1:**

This Condition applies to Emission Unit: E-WCST1



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Process: J04

**Item 1-53.2:**

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 µg of D/F TEQ per Mg ( $2.1 \times 10^{-4}$  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.

**Condition 1-54: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

i) The owner or operator of a group 1 furnace must use the limits in this paragraph to determine the emission standards for a SAPU pursuant to §63.1505(k).

2) 0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge from a group 1 melting/holding furnace processing only clean charge at a secondary aluminum production facility that is a major source.

The owner or operator may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group one furnace, rather than on the basis of feed/charge.

Upper Permit Limit: 0.80 pounds per ton

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED



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Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-55: Compliance Certification**

Effective between the dates of 06/01/2004 and 09/01/2007

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

**Item 1-55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 1-55.2:**

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.

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: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-56: Compliance Certification**

Effective between the dates of 06/01/2004 and 09/01/2007

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

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**Item 1-56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-56.2:**

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.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.01 pounds per ton

Reference Test Method: EPA RM 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-57: Emission Standards for Affected Sources and Emission Units**

**- In-line fluxers using no reactive flux materials**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-57.1:**

This Condition applies to Emission Unit: E-WCST1

Process: J04

**Item 1-57.2:**



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The emission limits in paragraphs 40 CFR Part 63.1505(j)(1) and (2) do not apply to an in-line fluxer that uses no reactive flux materials.

**Condition 1-58: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1506(d), Subpart RRR**

**Item 1-58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or  $\mu\text{g/Mg}$  (gr/ton) of feed/charge must:

- (1) Except as provided in paragraph (3) of this condition, install, calibrate, operate and maintain a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
- (2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- (3) The owner or operator may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
  - (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and
  - (ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
- (4) Feed/charge or aluminum production within SAPUs must

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be measured and recorded for each group 1 furnace and/or in-line fluxer.

(5) The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured.

The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.

(6) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

(7) As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-59: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

**Item 1-59.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR Part 63.1506(b) are intact and legible.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-60: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

**Item 1-60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or  $\mu\text{g/Mg}$  (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

(1) The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured.

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The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.

(2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-61: Secondary aluminum processing unit compliance by individual emission unit demonstration**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-61.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

**Item 1-61.2:**

As an alternative to the procedures in §63.1510(t), an owner/operator may demonstrate through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

**Condition 1-62: Site-specific test plan**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-62.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

**Item 1-62.2:**

Prior to conducting a performance test required by 40 CFR Part 63 Subpart RRR, the owner or operator



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must prepare and submit a site-specific test plan meeting the requirements in 40 CFR Part 63.7(c).

**Condition 1-63: Compliance Certification**

Effective between the dates of 06/01/2004 and 09/01/2007

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

**Item 1-63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

**Item 1-63.2:**

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

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-64: Testing of Representative Emission Units**

Effective between the dates of 06/01/2004 and 09/01/2007

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

**Item 1-64.1:**

This Condition applies to Emission Unit: E-WCST1

Process: J04

**Item 1-64.2:**

With the approval of the permitting authority, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:

(1) The tested emission unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;

(2) The tested emission unit is subject to the same work practices and the emission units that it represents;

(3) The tested emission unit is of the same design as the emission units that it represents;



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(4) The tested emission unit is tested under the highest load or capacity reasonably expected to occur for any of the emission units that it represents;

(5) At least one of each different style of emission unit at the facility is tested; and

(6) All add-on control devices are tested.

**Condition 1-65: Establishment of Monitoring and Operating Parameter Values  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-65.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

**Item 1-65.2:**

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 1-66: Performance Test/Compliance Demonstration Requirements and  
Procedures - Feed/Charge Weight Measurement.  
Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-66.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04



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**Item 1-66.2:**

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 1-67: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-67.2:**

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 MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-68: Equations for Determining Compliance - PM, HCl and D/F emission limits**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-68.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

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**Item 1-68.2:**

PM, HCl and D/F emission limits. Use Equation 7 to determine compliance with an emission limit for PM, HCl, and D/F:

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

Where,

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

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

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

K<sub>1</sub> = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and

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

**Condition 1-69: Notification of performance test date**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1515(a)(6), Subpart RRR**

**Item 1-69.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04

**Item 1-69.2:**

As required by §63.9(e) and (f), the owner/operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner/operator must notify EPA or NYSDEC 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.

**Condition 1-70: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Item 1-70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J04

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

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**Item 1-70.2:**

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

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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.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-71: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1516(b), Subpart RRR**

**Item 1-71.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J04

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

**Item 1-71.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required by §63.10(e)(3), semiannual reports must be submitted 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 occurred during the reporting period, a report stating that no excess emissions occurred shall be submitted.

1) A report must be submitted if any of these conditions occur during a 6-month reporting period:

- The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour
- The corrective action specified in the OM&M plan for a continuous opacity monitoring deviation was not initiated within 1 hour
- The corrective action specified in the OM&M plan for visible emissions from an aluminum scrap shredder was not initiated within 1 hour
- An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate, fabric filter inlet temperature, etc.)
- An action taken during a start up, shutdown, or malfunction was not consistent with the procedures in the plan as described in §63.6(e)(3)
- An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of Subpart RRR
- A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit

2) Each report must include any of the certifications listed in §63.1516(b)(2)(i)-(vi) which may be applicable.

3) 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.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 50: Emission Standards for Affected Sources and Emission Units  
- In-line fluxers using no reactive flux materials  
Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 50.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04 Emission Source: 01820

**Item 50.2:**

The emission limits in paragraphs 40 CFR Part 63.1505(j)(1) and (2) do not apply to an in-line fluxer that uses no reactive flux materials.

**Condition 51: Operating Requirements - In-line fluxer using no reactive  
flux material  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1506(l), Subpart RRR**

**Item 51.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04 Emission Source: 01820

**Item 51.2:**

The owner or operator of a new or existing in-line fluxer using no reactive flux materials must operate each in-line fluxer using no reactive flux materials.

**Condition 52: Monitoring and Compliance Requirements - In-line fluxers  
using no reactive flux  
Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 52.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04 Emission Source: 01820

**Item 52.2:**

The owner or operator of an in-line fluxer that uses no reactive flux materials must submit a certification of compliance with the operational standard for no reactive flux materials in 40 CFR Part 63.1506(l) for each 6-month reporting period. Each certification must contain the information in 40 CFR Part 63.1516(b)(2)(vi).



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**Condition 53: Performance Test/Compliance Demonstration Requirements and Procedures - In-line fluxer**  
Effective between the dates of 09/01/2002 and 09/01/2007

**Applicable Federal Requirement: 40CFR 63.1512(h)(1), Subpart RRR**

**Item 53.1:**

This Condition applies to Emission Unit: E-WCST1  
Process: J04 Emission Source: 01820

**Item 53.2:**

The owner or operator must conduct a performance test to measure emissions of HCl and PM. If the in-line fluxer is equipped with an add-on control device, the emissions must be measured at the outlet of the control device. If the in-line fluxer uses no reactive flux materials, emission tests for PM and HCl are not required.

**Condition 54: Compliance Certification**  
Effective between the dates of 09/01/2002 and 09/01/2007

**Applicable Federal Requirement: 40CFR 63.1516(b)(2)(vi), Subpart RRR**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1  
Process: J04 Emission Source: 01820

**Item 54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required by 40 CFR Part 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 40 CFR Part 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 reporting period. Each report must include this certification:

For each in-line fluxer using no reactive flux: "Only nonreactive, non-HAP-containing, non-HAP-generating flux gases, agents, or materials were used at any time during this reporting period."

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 55: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.1517(a), Subpart RRR**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: E-WCST1

Process: J04

Emission Source: 01820

**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required by 40CFR Part 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

(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.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-72: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 52.21, Subpart A**

**Replaces Condition(s) 57**



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**Item 1-72.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-DIG01

Process: E02

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-72.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to cap below PSD applicability thresholds, the source owner shall emit less than 5.7 pounds per hour of total particulates. The baghouse shall be operated in accordance with the plant wide particulate control operation and maintenance plan. Compliance testing shall be conducted upon request from the department.

Upper Permit Limit: 5.7 pounds per hour

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-73: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 52.21, Subpart A**

**Replaces Condition(s) 58**

**Item 1-73.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-DIG01

Process: E02

Regulated Contaminant(s):

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

**Item 1-73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING



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**Monitoring Description:**

In order to cap below PSD applicability thresholds, the source owner shall emit less than 3.4 pounds per hour of PM-10. The baghouse shall be operated in accordance with the plant wide particulate control operation and maintenance plan. Compliance testing shall be conducted upon request from the Department.

Upper Permit Limit: 3.4 pounds per hour

Reference Test Method: EPA Method 201A&202

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 59: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(d)**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

**Item 59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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.

Alcoa-East Plant must prepare and submit a BACT determination, to the department, to demonstrate how it will meet the requirements of 6 NYCRR Part 212 for benzene emissions from the potlines. For the purposes of 6 NYCRR



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Part 212, benzene emissions from the facility are given an environmental rating of A.

The BACT determination shall be submitted no later than 120 days after the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 60: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(d)**

**Item 60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

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

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
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.

Alcoa-East Plant must prepare and submit a BACT determination, to the department, to demonstrate how it will meet the requirements of 6 NYCRR Part 212 for particulate emissions from the potlines.

The BACT determination shall be submitted no later than 120 days after the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**Condition 61: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(d)**

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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.

Alcoa-East Plant must prepare and submit a BACT determination, to the department, to demonstrate how it will meet the requirements of 6 NYCRR Part 212 for carbon monoxide emissions from the potline. For the purposes of 6 NYCRR Part 212, carbon monoxide emissions from the potline are given an environmental rating of C.

The BACT determination shall be submitted no later than 120 days after the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 62: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.5(d)**

**Item 62.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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.

Alcoa-East Plant must prepare and submit a BACT determination, to the department, to demonstrate how it will meet the requirements of 6 NYCRR Part 212 for sulfur dioxide emissions from the potlines. For the purposes of 6 NYCRR Part 212, sulfur dioxide emissions from the facility are given an environmental rating of B.

The BACT determination shall be submitted no later than 120 days after the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 63: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY998-00-0      VOC

**Item 63.2:**



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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Where the facility owner or operator can show to the satisfaction of the department that an emission point cannot achieve an overall removal efficiency of 81% for reasons of technological or economic feasibility, the department may accept a lesser degree of control upon submission of satisfactory evidence that the facility owner or operator will apply reasonably available control technology. These process specific RACT demonstrations which are acceptable to the department will be submitted to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan by the department.

A RACT analysis of the VOC emissions from the potlines will be submitted by the facility to the department within 120 days of the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 64: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.846, Subpart LL**

**Item 64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(d) Implementation plan. The owner or operator shall develop and submit an implementation plan for emission averaging to the applicable regulatory authority for review and approval according to the following procedures and requirements:

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(1) Deadlines. The owner or operator must submit the implementation plan no later than 6 months before the date that the facility intends to comply with the emission averaging limits.

(2) Contents. The owner or operator shall include the following information in the implementation plan or in the application for an operating permit for all emission sources to be included in an emissions average:

(i) The identification of all emission sources (potlines or anode bake furnaces) in the average;

(ii) The assigned TF or POM emission limit for each averaging group of potlines or anode bake furnaces;

(iii) The specific control technology or pollution prevention measure to be used for each emission source in the averaging group and the date of its installation or application. If the pollution prevention measure reduces or eliminates emissions from multiple sources, the owner or operator must identify each source;

(iv) The test plan for the measurement of TF or POM emissions in accordance with the requirements in §63.847(b);

(v) The operating parameters to be monitored for each control system or device and a description of how the operating limits will be determined;

(vi) If the owner or operator requests to monitor an alternative operating parameter pursuant to §63.848(1):

(A) A description of the parameter(s) to be monitored and an explanation of the criteria used to select the parameter(s); and

(B) A description of the methods and procedures that will be used to demonstrate that the parameter indicates proper operation of the control device; the frequency and content of monitoring, reporting, and record keeping requirements; and a demonstration to the satisfaction of the applicable regulatory authority, that the proposed monitoring frequency is sufficient to represent control device operation conditions; and

(vii) A demonstration that compliance with each of the applicable emission limit(s) will be achieved under representative operating conditions.

(3) Approval criteria. Upon receipt, the regulatory authority shall review and approve or

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disapprove the plan or permit application according to the following criteria:

(i) Whether the content of the plan includes all of the information specified in paragraph (d)(2) of this section; and

(ii) Whether the plan or permit application presents sufficient information to determine that compliance will be achieved and maintained.

(4) Prohibitions. The applicable regulatory authority shall not approve an implementation plan or permit application containing any of the following provisions:

(i) Any averaging between emissions of differing pollutants or between differing sources. Emission averaging shall not be allowed between TF and POM, and emission averaging shall not be allowed between potlines and bake furnaces;

(ii) The inclusion of any emission source other than an existing potline or existing anode bake furnace or the inclusion of any potline or anode bake plant not subject to the same operating permit;

(iii) The inclusion of any potline or anode bake furnace while it is shut down; or

(iv) The inclusion of any periods of startup, shutdown, or malfunction, as described in the startup, shutdown, and malfunction plan required by §63.850(c), in the emission calculations.

(5) Term. Following review, the applicable regulatory authority shall approve the plan or permit application, request changes, or request additional information. Once the applicable regulatory authority receives any additional information requested, the applicable regulatory authority shall approve or disapprove the plan or permit application within 120 days.

(i) The applicable regulatory authority shall approve the plan for the term of the operating permit;

(ii) To revise the plan prior to the end of the permit term, the owner or operator shall submit a request to the applicable regulatory authority; and

(iii) The owner or operator may submit a request to the applicable regulatory authority to implement emission averaging after the applicable compliance date.

(6) Operation. While operating under an approved implementation plan, the owner or operator shall monitor the operating parameters of each control system, keep



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records, and submit periodic reports as required for each source subject to this subpart.

The facility shall average emissions of POM and Fluorides across all three potlines.

Reference Test Method: EPA Method 315 & 13A

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-74: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.846, Subpart LL**

**Replaces Condition(s) 66**

**Item 1-74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: ONY505-00-0 40 CFR 63 SUBPART LL - POM

**Item 1-74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of an existing potline may demonstrate compliance by emission averaging according to the procedures in this section:

-Quarterly average emissions of Polycyclic Organic Matter (POM) shall not exceed 3.8 pounds per ton of aluminum produced as set forth in Table 2 of this subpart for 3 Horizontal Stud Soderberg potlines. The emission rate shall be calculated based on the total emissions from all potlines over the period divided by the quantity of aluminum produced during the period, from all potlines comprising the averaging group.

-To determine compliance with the emission limit for POM, the owner or operator shall determine the quarterly average emissions (in lb/ton) from each potline from at



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least one run each month (24 hours per run) per potline each quarter for POM secondary emissions using the procedures and methods in 40 CFR 63.847 and 63.849. The owner or operator shall combine the result of secondary POM quarterly average with the POM results for the primary control system and divide total emissions by total aluminum production.

-The owner or operator shall develop and submit an implementation plan for emission averaging to the department for review and approval in accordance with 40 CFR 63.846(d)

Upper Permit Limit: 3.8 pounds per ton

Reference Test Method: EPA Method 315

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-75: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.846, Subpart LL**

**Replaces Condition(s) 65**

**Item 1-75.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

**Item 1-75.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of an existing potline may demonstrate compliance by emission averaging according to the procedures in this section:

-Monthly average emissions of Total Fluorides (TF) shall

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not exceed 2.4 pounds per ton of aluminum produced as set forth in Table 1 of this subpart for 3 Horizontal Stud Soderberg potlines. The emission rate shall be calculated based on the total emissions from all potlines over the period divided by the quantity of aluminum produced during the period, from all potlines comprising the averaging group.

-To determine compliance with the emission limit for TF, the owner or operator shall determine the monthly average emissions (in lb/ton) from each potline from at least three runs (24 hours per run) per potline each month for TF secondary emissions using the procedures and methods in 40 CFR 63.847 and 63.849. The owner or operator shall combine the result of secondary TF monthly average with the TF results for the primary control system and divide total emissions by total aluminum production.

-The owner or operator shall develop and submit an implementation plan for emission averaging to the department for review and approval in accordance with 40 CFR 63.846(d)

Upper Permit Limit: 2.4 pounds per ton

Reference Test Method: EPA Method 13A

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 67: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.846(b)(2), Subpart LL**

**Item 67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

**Item 67.2:**



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Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Annual emission testing for Total Fluorides shall be conducted on the primary control device and the results shall be used to show compliance with 40 CFR 63.846 for emissions averaging.

Parameter Monitored: FLUORIDES

Upper Permit Limit: 2.4 pounds per ton

Reference Test Method: EPA Method 13A

Monitoring Frequency: ANNUALLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-76: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.846(b)(2), Subpart LL**

**Replaces Condition(s) 68**

**Item 1-76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

**Item 1-76.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

To determine compliance with the applicable emission limit in Table 1 of Subpart LL for total fluoride emissions, the owner or operator shall determine the monthly average emissions (in lb/ton) from each potline from at least three runs per potline each month for total fluoride secondary emissions using the procedures and methods in Sections 63.847 and 63.849. The owner or operator shall combine the results of secondary total fluoride monthly average emissions with the total fluoride results for the primary control system and divide total emissions by total aluminum production.



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Parameter Monitored: FLUORIDES  
Upper Permit Limit: 2.4 pounds per ton  
Reference Test Method: Method 13A  
Monitoring Frequency: MONTHLY  
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 69: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 69.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):  
CAS No: ONY505-00-0 40 CFR 63 SUBPART LL - POM

**Item 69.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The initial performance test and all subsequent performance tests for Polycyclic Organic Matter emissions shall be conducted in accordance with the requirements of the general provisions in subpart A of this part, the approved test plan, and the procedures in this section.

Parameter Monitored: 40 CFR 63 SUBPART LL - POM  
Upper Permit Limit: 3.8 pounds per ton  
Reference Test Method: EPA Method 315  
Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION  
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 70: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

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**Item 70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 068188-85-2 FLUORIDES

**Item 70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The initial performance test and all subsequent performance tests for Fluorides emissions shall be conducted in accordance with the requirements of the general provisions in subpart A of this part, the approved test plan, and the procedures in this section.

Parameter Monitored: FLUORIDES

Upper Permit Limit: 2.4 pounds per ton

Reference Test Method: EPA Method 13A

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 71: Performance Test Requirements - Previous Control Device Tests**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.847(d)(3), Subpart LL**

**Item 71.1:**

This Condition applies to Emission Unit: P-OT001

**Item 71.2:**

If the owner or operator has performed more than one test of primary emission control device(s) for a potline or for a bake furnace 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 72: Calculation of aluminum production rate**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.847(e)(6), Subpart LL**

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**Item 72.1:**

This Condition applies to Emission Unit: P-OT001

**Item 72.2:**

The owner/operator shall determine compliance with the applicable TF and 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 aluminum tapped from the potline during the calendar month that includes the three runs of a performance test.

**Condition 73: Selection of monitoring parameters - potlines and anode  
bake furnaces  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.847(h)(1), Subpart LL**

**Item 73.1:**

This Condition applies to Emission Unit: P-OT001

**Item 73.2:**

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). For potlines and anode bake furnaces, the owner/operator shall determine upper and/or lower operating limits, as appropriate, for each monitoring device for the emission control system from the values recorded during each of the runs performed during the initial performance test and from historical data from previous performance tests conducted by the methods specified in subpart LL.

**Condition 1-77: Compliance Certification  
Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(a), Subpart LL**

**Replaces Condition(s) 74**

**Item 1-77.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):  
CAS No: 068188-85-2 FLUORIDES

**Item 1-77.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING  
Monitoring Description:  
Using the procedures in §63.847 and in the approved test plan, the owner/operator shall monitor emissions of TF



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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 emissions must represent a complete operating cycle.

Parameter Monitored: FLUORIDES

Upper Permit Limit: 2.4 pounds per ton

Reference Test Method: EPA method 13A

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-78: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(b), Subpart LL**

**Item 1-78.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

**Item 1-78.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Using the procedures in §63.847 and in the approved test plan, the owner/operator shall monitor emissions of POM from each Soderberg (HSS, VSS1, and VSS2) potline every three months. The owner/operator shall compute and record the quarterly (3-month) average from at least one run per month for secondary emissions and the previous 12-month average of all runs for the primary control systems to determine compliance with the applicable emission limit. The owner/operator must include all valid runs in the



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quarterly (3-month) average. The duration of each run for secondary emissions must represent a complete operating cycle. The primary control system must be sampled over an 8-hour period, unless site-specific factors dictate an alternative sampling time subject to the approval of the New York State DEC.

Parameter Monitored: 40 CFR 63 SUBPART LL - POM

Upper Permit Limit: 3.8 pounds per ton

Reference Test Method: EPA Method 315

Monitoring Frequency: QUARTERLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 76: Monitoring parameters for emission control devices  
Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(f), Subpart LL**

**Item 76.1:**

This Condition applies to Emission Unit: P-OT001

**Item 76.2:**

(f) Monitoring parameters for emission control devices. The owner or operator shall install, operate, calibrate, and maintain a continuous parameter monitoring system for each emission control device. The owner or operator shall submit for approval by the regulatory authority 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 regulatory authority. Except as provided in paragraph (l) of this section, the following monitoring devices shall be installed:

- (1) For dry alumina scrubbers, devices for the measurement of alumina flow and air flow;
- (2) For dry coke scrubbers, devices for the measurement of coke flow and air flow;
- (3) For wet scrubbers as the primary control system, devices for the measurement of water flow and air flow;
- (4) For electrostatic precipitators, devices for the measurement of voltage and secondary current; and
- (5) For wet roof scrubbers for secondary emission control:
  - (i) A device for the measurement of total water flow; and
  - (ii) The owner or operator shall inspect each control device at least once each operating day to ensure the control device is operating properly and record the results of each inspection.

**Condition 1-79: Compliance Certification**

**Effective between the dates of 06/01/2004 and 09/01/2007**



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**Applicable Federal Requirement: 40CFR 63.848(g), Subpart LL**

**Replaces Condition(s) 77**

**Item 1-79.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-79.2:**

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.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 78: Corrective action procedures**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(h), Subpart LL**

**Item 78.1:**

This Condition applies to Emission Unit: P-OT001

**Item 78.2:**

If a monitoring device for a primary control device measures an operating parameter outside the limit(s) established pursuant to §63.847(h), or if visible emissions indicating abnormal operation are observed from the exhaust stack of a control device during a daily inspection, the owner/operator shall initiate the corrective action procedures identified in the startup, shutdown, and malfunction plan within 1 hour. Failure to initiate the corrective action procedures within 1 hour or to take the necessary corrective actions to remedy the problem is a violation.

**Condition 79: Exceedances**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(i), Subpart LL**



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**Item 79.1:**

This Condition applies to Emission Unit: P-OT001

**Item 79.2:**

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 80: Accuracy and calibration requirements**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.848(k), Subpart LL**

**Item 80.1:**

This Condition applies to Emission Unit: P-OT001

**Item 80.2:**

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 81: Definition of potline in Method 14**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.849(c), Subpart LL**

**Item 81.1:**

This Condition applies to Emission Unit: P-OT001

**Item 81.2:**

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 82: Installation of manifolds for potlines subject to Method 14**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.849(d), Subpart LL**

**Item 82.1:**

This Condition applies to Emission Unit: P-OT001

**Item 82.2:**

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.

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**Condition 83: Notification of initial performance test**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.850(a)(5), Subpart LL**

**Item 83.1:**

This Condition applies to Emission Unit: P-OT001

**Item 83.2:**

The owner/operator shall submit the notification of initial performance test.

**Condition 84: Notification of initial compliance status**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.850(a)(6), Subpart LL**

**Item 84.1:**

This Condition applies to Emission Unit: P-OT001

**Item 84.2:**

The owner/operator shall submit the notification of initial compliance status.

**Condition 85: Performance test reports**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 85.1:**

This Condition applies to Emission Unit: P-OT001

**Item 85.2:**

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 annual basis.

**Condition 86: Startup, shutdown, and malfunction plan and reports**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 86.1:**

This Condition applies to Emission Unit: P-OT001

**Item 86.2:**

The owner/operator shall develop and implement 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



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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 87: Startup, shutdown, and malfunction plan and reports**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 87.1:**

This Condition applies to Emission Unit: P-OT001

**Item 87.2:**

The owner/operator shall develop and implement 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 1-80: Compliance Certification**  
**Effective between the dates of 06/01/2004 and 09/01/2007**

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

**Replaces Condition(s) 88**

**Item 1-80.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

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

**Item 1-80.2:**

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



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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.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 89: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 89.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

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

**Item 89.2:**

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.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 90: Compliance Certification**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 90.1:**

The Compliance Certification activity will be performed for:



**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 90.2:**

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.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 91: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

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

**Item 91.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 91.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator may report required information on paper or on a labeled computer disc using commonly available and compatible computer software.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 92: Compliance Certification**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable Federal Requirement: 40CFR 63.850(e)(4), Subpart LL**

**Item 92.1:**

The Compliance Certification activity will be performed for:

**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**



Emission Unit: P-OT001

**Item 92.2:**

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.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**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 93: Contaminant List**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: ECL 19-0301**

**Item 93.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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CAS No: 0NY505-00-0  
Name: 40 CFR 63 SUBPART LL - POM

CAS No: 000071-43-2  
Name: BENZENE

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

CAS No: 000463-58-1  
Name: CARBONYL SULFIDE

CAS No: 007782-50-5  
Name: CHLORINE

CAS No: 068188-85-2  
Name: FLUORIDES

CAS No: 0NY100-00-0  
Name: HAP

CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 007664-39-3  
Name: HYDROGEN FLUORIDE

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

CAS No: 0NY075-00-0  
Name: PARTICULATES

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

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0  
Name: VOC

**Condition 94: Unavoidable noncompliance and violations**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 201-1.4**



**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

Item 94.1:

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 95: Air pollution prohibited**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 211.2**

**New York State Department of Environmental Conservation**

Permit ID: 6-4058-00024/00077

Facility DEC ID: 6405800024



**Item 95.1:**

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 1-81: Compliance Demonstration**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 100**

**Item 1-81.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: P-OT001

Process: A02                      Emission Source: B5156

Emission Unit: P-OT001

Process: A02                      Emission Source: C5156

Regulated Contaminant(s):

CAS No: 000463-58-1      CARBONYL SULFIDE

**Item 1-81.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

To ensure proper control of Carbonyl Sulfide, the North and South wet scrubbers shall operate with a pH within the range specified below for optimum acid gas removal. A PLC computer shall continuously track the pH and a 24 hour average will be generated to compare to the operating limits. If the average falls outside the range, corrective action shall be taken and the excursion will be logged. A report of the number of times and the amount of time the average was outside the range and the corrective action taken shall be submitted semi-annually on a calendar year basis.

This Continuous Monitoring System (CMS) will be operated and maintained according to a CMS Operation and



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Maintenance Plan (CMS O&M) that will be submitted to the Department for review and approval. The CMS O&M plan will be updated as necessary and any changes shall also be submitted to the Department for approval.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 7.0 pH units

Upper Permit Limit: 8.0 pH units

Monitoring Frequency: CONTINUOUS

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2004.

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

**Condition 1-82: Compliance Demonstration**

**Effective between the dates of 06/01/2004 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 101**

**Item 1-82.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST1

Process: J01

Emission Unit: E-WCST1

Process: J04

Emission Unit: P-OT001

Process: A02

Emission Source: B5156

Emission Unit: P-OT001

Process: A02

Emission Source: C5156

Regulated Contaminant(s):

CAS No: 000463-58-1 CARBONYL SULFIDE

**Item 1-82.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

To ensure proper control of Carbonyl Sulfide, the North  
and South wet scrubbers shall operate with a Liquor Level



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between 73% and 95% of the total capacity for optimum acid gas removal. A PLC computer shall continuously track the Liquor level and a 24 hour average will be generated to compare to the operating limits. If the average falls outside the range, corrective action shall be taken and the excursion will be logged. A report of the number of times and the amount of time the average was outside the range and the corrective action taken shall be submitted semi-annually on a calendar year basis.

This Continuous Monitoring System (CMS) will be operated and maintained according to a CMS Operation and Maintenance Plan (CMS O&M) that will be submitted to the Department for review and approval. The CMS O&M plan will be updated as necessary and any changes shall also be submitted to the Department for approval.

Parameter Monitored: LIQUOR  
Lower Permit Limit: 73 percent  
Upper Permit Limit: 95 percent  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 24-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 60 days after the reporting period.  
The initial report is due 8/29/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 96: Compliance Demonstration**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Item 96.1:**

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

Emission Unit: E-WCST1  
Process: J01

Emission Unit: E-WCST1  
Process: J04

Regulated Contaminant(s):  
CAS No: 007664-39-3 HYDROGEN FLUORIDE

**Item 96.2:**

Compliance Demonstration shall include the following monitoring:



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**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR part 212.4(a), Hydrogen Fluoride has been issued an environmental rating of B. The emission rate potential of Hydrogen Fluoride from each emission source in these processes 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: RM 26

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 97: Compliance Demonstration**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Item 97.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST1

Process: J01

Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 97.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

As required by 6 NYCRR part 212.4(a), Hydrogen Chloride has been issued an environmental rating of B. The emission rate potential of Hydrogen Chloride from each emission source in these processes 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: RM 26



**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 98: Compliance Demonstration**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Item 98.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

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

CAS No: 0NY100-00-0 HAP

**Item 98.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The potlines shall be operated according to the Best Practices Plan (BPP) in order to minimize secondary emissions of pollutants from the pots. The BPP is to be revised as needed to reflect modifications and improvements in operations or the availability of new information.

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 99: Compliance Demonstration**  
**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.4(a)**

**Item 99.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST1

Process: J01

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**Facility DEC ID: 6405800024**



Emission Unit: E-WCST1

Process: J04

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE

**Item 99.2:**

Compliance Demonstration 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 these processes 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: RM 18

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 102: Compliance Demonstration**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 209**

**Item 102.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 0NY505-00-0 40 CFR 63 SUBPART LL - POM

CAS No: 068188-85-2 FLUORIDES

**Item 102.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



**New York State Department of Environmental Conservation**

**Permit ID: 6-4058-00024/00077**

**Facility DEC ID: 6405800024**

**Monitoring Description:**

The more stringent requirements of 40 CFR 63 subpart LL apply to the emissions of Fluorides, Polycyclic Organic Matter (POMs)(of which polycyclic aromatic hydrocarbons are a subset), and opacity at this facility. As long as the facility is in compliance with the requirements in subpart LL, then it is in compliance with the requirements of 6 NYCRR part 209. See subpart LL requirements for monitoring and reporting frequencies.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 103: Compliance Demonstration**

**Effective between the dates of 09/01/2002 and 09/01/2007**

**Applicable State Requirement: 6NYCRR 212.5(d)**

**Item 103.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OT001

Regulated Contaminant(s):

CAS No: 000463-58-1 CARBONYL SULFIDE

**Item 103.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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.

Alcoa-East Plant must prepare and submit a BACT determination, to the department, to demonstrate how it will meet the requirements of 6 NYCRR Part 212 for carbonyl sulfide emissions from the potlines. For the purposes of 6 NYCRR Part 212, carbonyl sulfide emissions from the facility are given an environmental rating of



B.

The BACT determination shall be submitted no later than 120 days after the permit issuance date.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION