

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



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 6-4058-00024/00083  
Effective Date: 09/19/2005                      Expiration Date: No expiration date

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 CO RTE 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 \*\*\*\***  
**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, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual



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

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

**Condition 5: Submission of 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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**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT**

**IDENTIFICATION INFORMATION**

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

Facility: REYNOLDS METALS ST LAWRENCE REDUCTION PL  
194 CO RTE 45  
MASSENA, NY 13662

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



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 40CFR 63.1505(i), Subpart RRR: Compliance Demonstration
- 2 40CFR 63.1505(i), Subpart RRR: Compliance Demonstration
- 3 40CFR 63.1505(k)(3), Subpart RRR: Compliance Demonstration
- 4 40CFR 63.1506(b), Subpart RRR: Compliance Demonstration
- 5 40CFR 63.1506(d), Subpart RRR: Compliance Demonstration
- 6 40CFR 63.1510(p), Subpart RRR: Compliance Demonstration
- 7 40CFR 63.1510(q), Subpart RRR: Compliance Demonstration
- 8 40CFR 63.1511(a), Subpart RRR: Compliance Demonstration
- 9 40CFR 63.1513(d), Subpart RRR: Compliance Demonstration
- 10 40CFR 63.1515(a)(6), Subpart RRR: Compliance Demonstration
- 11 40CFR 63.1515(b), Subpart RRR: Compliance Demonstration
- 12 40CFR 63.1516, Subpart RRR: Compliance Demonstration
- 13 40CFR 63.1517, Subpart RRR: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 14 ECL 19-0301: Contaminant List
- 15 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 16 6NYCRR 201-5: Emission Unit Definition
- 17 6NYCRR 201-7: Facility Permissible Emissions
- \*18 6NYCRR 201-7: Capping Monitoring Condition
- \*19 6NYCRR 201-7: Capping Monitoring Condition
- 20 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 21 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 22 6NYCRR 201-5: Process Definition By Emission Unit

**NOTE: \* preceding the condition number indicates capping.**

Permit Effective Date: 09/19/2005

Permit Expiration Date: No expiration date.



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. 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



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occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

**Item 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: 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 requirements, regulations, or law.

**Item I: 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



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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 J: 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 K: 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 L: 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 M: 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



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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 N: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 1.1:**

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

Emission Unit: E-WCST2  
Process: K01

Emission Unit: E-WCST2  
Process: K04

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

**Item 1.2:**

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Testing shall be completed to show compliance with the limit of 0.40 pounds of PM per ton of Aluminum Produced at least once during the term of the permit in order to process "un-clean" aluminum scrap in the furnaces.

Upper Permit Limit: 0.40 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 2: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 2.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2

Process: K01

Emission Unit: E-WCST2

Process: K04

Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Testing shall be completed to show compliance with the limit for D/F TEQ at least once during the term of the permit in order to process "un-clean" aluminum scrap in the furnaces.

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

Reference Test Method: EPA Method 23

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

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**METHOD INDICATED**

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 3: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 3.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2

Process: K01

Emission Unit: E-WCST2

Process: K04

Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a SAPU must not discharge or allow to be discharged to the atmosphere any 3-day, 24 hr rolling average emissions of D/F in excess of that which is calculated using equation 3 of 40 CFR 63.1505(k)(3).

The owner or operator of a SAPU that is a major source may choose to show compliance by demonstrating compliance with each individual unit emission limit within the SAPU.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2006.

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

**Condition 4: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

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**Item 4.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2

Process: K01

Emission Unit: E-WCST2

Process: K04

Regulated Contaminant(s):

CAS No: 051207-31-9    2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The labels on the affected units must be changed to include the new emission limits as well all the capping requirements on the type of scrap being charged.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 5: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 051207-31-9    2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected source or emission unit subject to a charge weight tracking requirement must install and operate a device that measures and records the



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feed charge weight of the "un-clean" scrap for each cycle or time period used in the performance test. The equipment shall be operated according to the approved O,M & M Plan.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In the event the facility chooses to charge non-uniform scrap into the furnaces, a scrap inspection program must be submitted and approved before it can be charged. The inspection program must include:

- (1) A proven method for collecting representative samples and measuring the oil and coatings content of scrap samples;
- (2) A scrap inspector training program;
- (3) An established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
- (4) Periodic physical measurements of oil and coatings content of randomly selected scrap samples and comparison with visual inspection results;
- (5) A system for assuring that only accepted scrap is charged to an affected group 1 furnace;



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(6) Recordkeeping requirements to document conformance with plan requirements.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 7: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 7.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2

Process: K01

Emission Unit: E-WCST2

Process: K04

Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Should the facility charge a uniform scrap to the furnaces, it may incorporate a calculation method into the site specific monitoring plan for determining, monitoring, and certifying the scrap contaminant level rather than using a scrap inspection program. A scrap contaminant monitoring program must include:

(1) Procedures for the characterization and documentation of the contaminant level of the scrap prior to the performance test;

(2) Limitations on the furnace feed/charge to scrap of the same composition as that used in the performance test. If the performance test was performed with a mixture of scrap and clean charge, limitations on the proportion of scrap in the furnace feed/charge to no greater than the proportion used in the performance test;

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(3) Operating, monitoring, recordkeeping, and reporting requirements to ensure that no scrap with a contaminant level higher than that used in the performance test is charged to the furnace.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall modify and submit for approval, a revised site specific test plan meeting the requirements of 40 CFR 63.7(c).

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To convert D/F emission measurements to TEQ units, the owner or operator must use the procedures and equations in "Interim Procedures for Estimating Risks Associated with Exposures to mixtures Chlorinated Dibenzo-p-dioxins and -Dibenzofurans and 1989 update", incorporated by reference



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in 40 CFR 63.1502.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 10: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 10.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall provide notification of the anticipated date for conducting performance tests and visible emissions observations. Notification shall be at least 60 days prior to the scheduled test.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 11: Compliance Demonstration**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

CAS No: 007647-01-0 HYDROGEN CHLORIDE

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

CAS No: 0NY075-00-0 PARTICULATES

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall submit a Notification of Compliance



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Status Report 60 days after the completed performance test to include, and certify compliance with, any requirements to charge scrap into the furnaces.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The reports required under this citation shall be modified to include the required information to charge scrap into the furnaces.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required to be kept under this citation shall be modified to include those required for the addition of scrap to the charge of the furnaces.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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**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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)**

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**Item B: 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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 14: Contaminant List**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: ECL 19-0301**

**Item 14.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 001746-01-6

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

CAS No: 051207-31-9

Name: 2,3,7,8-TETRACHLORODIBENZOFURAN

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

**Condition 15: Unavoidable noncompliance and violations**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-1.4**

**Item 15.1:**

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



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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 16: Emission Unit Definition**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 16.1:**

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

Emission Unit: E-WCST2

Emission Unit Description:

THIS TEMPORARY LABEL ON EMISSION UNIT EWCST1 CONSISTS OF EMISSION SOURCES AND EMISSION POINTS LOCATED IN THE EAST AND WEST CASTHOUSES THAT WILL BEGIN PROCESSING SCRAP ALUMINUM. THERE ARE THREE PROCESSES IDENTIFIED WITHIN THE EMISSION UNIT; PROCESS J01, J02, AND J05. THESE ARE TEMPORARILY LABELED K01, K02, AND K03. THE



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FURNACES ARE NATURAL GAS FIRED MELTER/HOLDERS. THIS EMISSION UNIT ALSO INCLUDES MISCELLANEOUS FUGITIVE EMISSIONS GENERATED WITHIN THE EAST AND WEST CASTHOUSE.

**Condition 17: Facility Permissible Emissions**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 17.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 001746-01-6 PTE: 0.000291 pounds per year  
Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 051207-31-9 PTE: 0.000291 pounds per year  
Name: 2,3,7,8-TETRACHLORODIBENZOFURAN

**Condition 18: Capping Monitoring Condition**  
**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 18.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 212.4(b)

**Item 18.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 18.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 18.4:**



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On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 18.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 18.6:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2  
Process: K01

Emission Unit: E-WCST2  
Process: K04

Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 18.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to comply with the NYS DEC Air Guide 1 Annual Guideline Concentration impact requirements, the facility must limit emissions of D/F TEQ. This will be done by limiting the throughput of "un-clean" scrap into the furnaces to 36,360 tons on an annual basis rolled monthly.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: SCRAP

Upper Permit Limit: 36360 tons per year

Reference Test Method: EPA Method 23

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.



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The initial report is due 3/1/2006.

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

**Condition 19: Capping Monitoring Condition**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 19.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 212.4(b)

**Item 19.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 19.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 19.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 19.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 19.6:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: E-WCST2

Process: K01

Emission Unit: E-WCST2

Process: K04



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Regulated Contaminant(s):

CAS No: 051207-31-9 2,3,7,8-TETRACHLORODIBENZOFURAN

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

**Item 19.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to comply with the NYS DEC Air Guide 1 Annual Guideline Concentration impact requirements, the facility must limit emissions of D/F TEQ. This will be done by limiting the throughput of "un-clean" scrap into the furnaces to 36,360 tons on an annual basis rolled monthly.

In order to do this, emissions of D/F TEQ shall not exceed 7.996 micrograms per megagram of Secondary Aluminum Produced from the furnaces as measured during the required emissions test.

Upper Permit Limit: 7.996 micrograms of D/F TEQ per Mg

Reference Test Method: EPA Method 23

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 20: Air pollution prohibited**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 20.1:**

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.

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

**Condition 21: Emission Point Definition By Emission Unit**

**Effective between the dates of 09/19/2005 and Permit Expiration Date**

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**Applicable State Requirement: 6NYCRR 201-5**

Applicaton Specific Data

**Condition 22: Process Definition By Emission Unit  
Effective between the dates of 09/19/2005 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 22.1:**

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

Emission Unit: E-WCST2

Process: K01

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: FURN7 - Process

Emission Source/Control: FURN8 - Process

**Item 22.2:**

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

Emission Unit: E-WCST2

Process: K04

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: FURN2 - Process

Emission Source/Control: FURN3 - Process

Emission Source/Control: FURN4 - Process