New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 6-4058-00024/00077 Modification Number: 1 **06/03/2004**

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

Owner/Firm
Name: REYNOLDS METALS CO
Address: 201 ISABELLA ST
PITTSBURGH, PA 15212-5858, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: LAWRENCE R AMBEAU
Address: DIVISION OF ENVIRONMENTAL PERMITS
STATE OFFICE BLDG, 317 WASHINGTON ST
WATERTOWN, NY 13601
Phone:3157852513

Division of Air Resources:
Name: ROBERT A JACOBS
Address: 317 WASHINGTON ST
WATERTOWN, NY 13601
Phone:3157852513

Air Permitting Contact:
Name: DENNIS KRAUSE
Address: ALCOA INC
PO BOX 150
MASSENA, NY 13662-0150
Phone:3157644642

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
THIS APPLICATION FOR A TITLE V MODIFICATION IS BEING SUBMITTED TO

INCORPORATE THE FEDERAL SECONDARY ALUMINUM NESHAP REQUIREMENTS INTO THE FACILITY'S TITLE V PERMIT. THE SECONDARY ALUMINUM NESHAP (40 CFR 63 SUBPART RRR) IS APPLICABLE TO REYNOLDS METALS COMPANY'S (A.K.A. ALCOA EAST), (5) FIVE MELTING AND HOLDING FURNACES, AND ITS (2) TWO IN-LINE DEGASSERS (THE PLANT ALSO OPERATES AN ALCAN COMPACT DEGASSER (ACD) WHICH IS ALSO SUBJECT TO THIS NESHAP, AND IS CURRENTLY PERMITTED AS SUCH IN THE EXISTING TITLE V PERMIT). THE NESHAP BECAME EFFECTIVE FOR THE "EXISTING" SOURCES ON MARCH 24, 2003 AND REGULATES EMISSIONS OF PARTICULATE MATTER (PM), AND HYDROGEN CHLORIDE (HCl). ALCOA CONDUCTED EMISSION TESTING IN THE FALL OF 2002 TO COMPLY WITH THE REGULATION' S PERFORMANCE TESTING REQUIREMENTS AND HAS NUMEROUS OPERATING AND MONITORING REQUIREMENTS TO COMPLY WITH FOR EACH AND EVERY OPERATING CYCLE.

Attainment Status

REYNOLDS METALS ST LAWRENCE REDUCTION PL is located in the town of MASSENA in the county of ST LAWRENCE.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

REYNOLDS METALS COMPANYY OWNS AND OPERATES A PRIMARY ALUMINUM REDUCTION FACILITY IN MASSENA NY. OPERATIONS INCLUDE ELECTROLYTIC ALUMINUM REDUCTION, ANODE CARBON PASTE PREPARATION, AND ALUMINUM ALLOY CASTING AND PREPARATION.

Permit Structure and Description of Operations

The Title V permit for REYNOLDS METALS ST LAWRENCE REDUCTION PL is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion	-	devices which burn fuel to generate heat, steam or power
incinerator	-	devices which burn waste material for disposal
control	-	emission control devices
process	-	any device or contrivance which may emit air contaminants that is not included in the above categories.

REYNOLDS METALS ST LAWRENCE REDUCTION PL is defined by the following emission unit(s):
Emission unit POT001 - This emission unit consists of the three potlines.
Emission unit POT001 is associated with the following emission points (EP):
20B00, 20F02, 77A01, 77A02, PRV51, PRV52, PRV53, PRV54, PRV55, PRV56
It is further defined by the following process(es):
Process: A02This process is for the pots venting to the fume control system.
Process: A03This process consists of cruce augering and cleaning and cruce lid cleaning.
Process: A05This process consists of cathode baking.
Process: A06This process consists of pot cut-out.

Emission unit BOIL01 - 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.
Emission unit BOIL01 is associated with the following emission points (EP):
00C1B, 00C2B, 00C3B
It is further defined by the following process(es):
Process: I01 is located at Building 22H - 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.
Process: I03 is located at Building 22H - 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 unit CARB01 - 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.

Emission unit CARB01 is associated with the following emission points (EP):
22001, 22003, 22004, 22A01, 22A09, 22B01, 22C01, 22D01, 22E01, 22F01, 22F02, 22G01, 22G02
It is further defined by the following process(es):
Process: N02 is located at Building 22A - This process is for a 9.8 mmBTU/hr HTM burner while 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.
Process: N03 is located at Building 22A - 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.
Process: N04 is located at Building 22D - This process is the storage of petroleum coke in two 2,000 ton petroleum coke storage silos.
Process: N05 is located at Building 22 - 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.
Process: N07 is located at Building 22 - This process includes the carbon paste mixers and the coal tar pitch scales under the future operating scenario. 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.
Process: N10 is located at Building 22B - This process inlcudes 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 unit PDIG01 - This emission unit consists of emission sources, control devices, and emission points associated with the Cathode Digging Area, Facility 85.

Emission unit PDIG01 is associated with the following emission points (EP):
85002
It is further defined by the following process(es):
Process: E02 is located at Building 85 - 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.

Emission unit EWCST1 - THIS EMISSION UNIT CONSISTS OF EMISSION SOURCES AND EMISSION POINTS LOCATED IN THE EAT AND WEST CASTHOUSES. 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 CASTHOUSE.
Emission unit EWCST1 is associated with the following emission points (EP):
20002, 20003, 20004, 20010, 20011, 20013, 20014, 20015, 20018
It is further defined by the following process(es):
Process: J01 is located at Building 20G - 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.
Process: J02 is located at Building 20 - This process includes each of the cast house saws.
Process: J04THIS 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 unit PARTW1 - This emission unit consists of parts washers located throughout the RMC facility which would otherwise be classified as exempt activities consistant with 6 NYCRR part 201-3. However, except those that meet 6 NYCRR 226.7(a), all parts washers are subject to 6 NYCRR 226.
It is further defined by the following process(es):
Process: PW1This process consists of batch cold cleaning degreasers in use plant wide.

Emission unit ANOD01 - 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.
It is further defined by the following process(es):
Process: G01 is located at Building 35 - 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 unit DROS02 - This emission unit consists of emission sources associated with dross cooling in process Z01.
It is further defined by the following process(es):
Process: Z02 is located at Building 20 - 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.

Emission unit DROS01 - This emission unit consists of emissions sources associated with dross cooling

processes and storage, facility 20 and 20C. There are two processes associated with this emission unit, processes Z01. This emission unit includes miscellaneous fugitive emissions from the processes.
It is further defined by the following process(es):
Process: Z01 is located at Building 20 - 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 unit PAINO1 - 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.
It is further defined by the following process(es):
Process: Q01This 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 unit ULDG01 - 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.
Emission unit ULDG01 is associated with the following emission points (EP):
25A01, 25A02
It is further defined by the following process(es):
Process: P01This 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.
Process: P03This 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 unit CRSH01 - 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.
Emission unit CRSH01 is associated with the following emission points (EP):
82001, 82002
It is further defined by the following process(es):
Process: F01 is located at Building 82 - The crusher building is used to crush spent carbon, scrap carbon paste, pot strippings and basement ore. These mateirals 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 unit WWTR01 - 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.
It is further defined by the following process(es):
Process: WW1This 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.

Title V/Major Source Status
REYNOLDS METALS ST LAWRENCE REDUCTION PL is subject to Title V requirements. This determination is based on the following information:
This facility has emissions above major source thresholds for Particulates, PM-10, Sulfur Dioxide, Carbon Monoxide, Volatile Organic Compounds (VOCs), and collective Hazardous Air Pollutants (HAPs). Specific HAP emissions above 10 tons per year include Benzene, Carbonyl Sulfide, Hydrogen Chloride, Hydrogen Fluoride, and Polycyclic Organic Matter and Fluorides.

Program Applicability
The following chart summarizes the applicability of REYNOLDS METALS ST LAWRENCE REDUCTION PL with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES

SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's(hydrofluorocarbons)or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3334	PRIMARY ALUMINUM

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
4-01-003-36	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Entire Unit
3-03-003-31	PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION (BY-PRODUCT COKE MANUFACTURING) BY-PRODUCT COKE MANUFACTURING
3-03-003-12	PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION (BY-PRODUCT COKE MANUFACTURING) Coke: Crushing/Screening/Handling
3-03-003-99	PRIMARY METAL PRODUCTION PRIMARY METAL PRODUCTION (BY-PRODUCT COKE

```
                    MANUFACTURING)
                    NOT CLASSIFIED **
3-03-001-02         PRIMARY METAL PRODUCTION
                    PRIMARY METAL PRODUCTION - ALUMINUM ORE
                    (ELECTRO-REDUCTION)
                    Horizontal Stud Soderberg Cell
3-03-001-04         PRIMARY METAL PRODUCTION
                    PRIMARY METAL PRODUCTION - ALUMINUM ORE
                    (ELECTRO-REDUCTION)
                    Materials Handling
3-03-001-99         PRIMARY METAL PRODUCTION
                    PRIMARY METAL PRODUCTION - ALUMINUM ORE
                    (ELECTRO-REDUCTION)
                    NOT CLASSIFIED **
3-03-001-01         PRIMARY METAL PRODUCTION
                    PRIMARY METAL PRODUCTION - ALUMINUM ORE
                    (ELECTRO-REDUCTION)
                    Prebaked Reduction Cell
3-04-001-07         SECONDARY METAL PRODUCTION
                    SECONDARY METAL PRODUCTION - ALUMINUM
                    Hot Dross Processing
5-03-007-02         SOLID WASTE DISPOSAL - INDUSTRIAL
                    SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE
                    SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE
                    TREATMENT-GENERAL
4-02-001-01         SURFACE COATING OPERATIONS
                    SURFACE COATING APPLICATION - GENERAL
                    Paint: Solvent-Base
```

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range

000108-10-1	2-PENTANONE, 4-METHYL(HAP)		> 0 but < 10 tpy
0NY505-00-0	40 CFR 63 SUBPART LL - POM(HAP)		>= 10 tpy
000075-07-0	ACETALDEHYDE(HAP)		> 0 but < 10 tpy
000071-43-2	BENZENE(HAP)		>= 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)(HAP)		> 0 but < 10 tpy
007440-41-7	BERYLLIUM(HAP)		> 0 but < 10 tpy
007440-43-9	CADMIUM(HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 250 tpy
000463-58-1	CARBONYL SULFIDE(HAP)		>= 10 tpy
007782-50-5	CHLORINE(HAP)		> 0 but < 10 tpy
007440-47-3	CHROMIUM(HAP)		> 0 but < 10 tpy
000057-12-5	CYANIDE(HAP)		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE(HAP)		> 0 but < 10 tpy
068188-85-2	FLUORIDES		>= 10 tpy
000050-00-0	FORMALDEHYDE(HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 250 tpy
007647-01-0	HYDROGEN CHLORIDE(HAP)		>= 10 tpy
007664-39-3	HYDROGEN FLUORIDE(HAP)		>= 10 tpy
007439-92-1	LEAD(HAP)		> 0 but < 10 tpy
007439-96-5	MANGANESE(HAP)		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE(HAP)		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS(HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	198000	
0NY075-00-0	PARTICULATES		>= 250 tpy
000108-95-2	PHENOL(HAP)		> 0 but < 10 tpy
0NY075-00-5	PM-10		>= 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS(HAP)		>= 10 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
000108-88-3	TOLUENE(HAP)		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 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 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 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 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 - 6NYCRR 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 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 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 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 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)**
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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	93
FACILITY	40CFR 52-A.21	Prevention of Significant Deterioration	21
C-ARB01/-/N03	40CFR 52-A.21	Prevention of Significant Deterioration	1-24
P-DIG01/-/E02	40CFR 52-A.21	Prevention of Significant Deterioration	1-72, 1-73
FACILITY	40CFR 63-A	Subpart A - General Provisions apply to all NESHAP affected sources	1-8
FACILITY	40CFR 63-LL.841	Subpart LL - Incorporation by Reference	22
C-ARB01	40CFR 63-LL.843(b)	Emission Limits for Existing Sources - Paste Production Plants	42
P-OT001	40CFR 63-LL.846	Subpart LL - Emission Averaging	64, 1-74, 1-75
P-OT001	40CFR 63-LL.846(b)(2)	Emissions Averaging	67, 1-76
FACILITY	40CFR 63-LL.847(b)	Compliance Provisions - Test Plan	23
FACILITY	40CFR 63-LL.847(c)	Compliance Provisions - Initial Performance Test	24
P-OT001	40CFR 63-LL.847(d)	Performance test requirements to show compliance with the applicable limits.	69, 70
P-OT001	40CFR 63-LL.847(d)(3)	Performance Test Requirements - Previous Control Device Tests	71

P-OT001	40CFR 63-LL.847(e)(6)	Compliance Provisions - Calculation of Emission Rates	72
C-ARB01	40CFR 63-LL.847(f)	Compliance Provisions - Paste Production Plants	43
P-OT001	40CFR 63-LL.847(h)(1)	Compliance provisions - selection of monitoring parameters	73
C-ARB01	40CFR 63-LL.847(h)(2)	Compliance provisions - selection of monitoring parameters	44
C-ARB01	40CFR 63-LL.847(h)(3)	Compliance provisions - selection of monitoring parameters	45
P-OT001	40CFR 63-LL.848(a)	Emission Monitoring Requirements - TF emissions from potlines	1-77
P-OT001	40CFR 63-LL.848(b)	Emission Monitoring Requirements - POM emissions from Soderberg potlines	1-78
P-OT001	40CFR 63-LL.848(f)	Monitoring parameters for emission control devices	76
P-OT001	40CFR 63-LL.848(g)	Emission Monitoring Requirements - visible emissions	1-79
P-OT001	40CFR 63-LL.848(h)	Emission Monitoring Requirements - corrective action	78
P-OT001	40CFR 63-LL.848(i)	Emission Monitoring Requirements - exceedances	79
P-OT001	40CFR 63-LL.848(k)	Emission Monitoring Requirements - accuracy and calibration	80
FACILITY	40CFR 63-LL.849(a)	Test Methods and Procedures - listing of reference methods	25
P-OT001	40CFR 63-LL.849(c)	Test Methods and Procedures - definition of potline	81
P-OT001	40CFR 63-LL.849(d)	Test Methods and Procedures - potline manifolds for Method 14	82
FACILITY	40CFR 63-LL.849(e)	Test Methods and Procedures - alternative test methods for TF or POM emissions	26
P-OT001	40CFR 63-LL.850(a)(5)	Notification, Reporting, and Recordkeeping Requirements - notifications	83
P-OT001	40CFR 63-LL.850(a)(6)	Notification, Reporting, and Recordkeeping Requirements - notifications	84
P-OT001	40CFR 63-LL.850(b)	Notification, Reporting, and Recordkeeping Requirements - performance test reports	85
P-OT001	40CFR 63-LL.850(c)(1)	Notification, Reporting, and Recordkeeping Requirements - startup,	86

		shutdown, and malfunction plan and reports	
P-OT001	40CFR 63-LL.850(c)(2)	Notification, Reporting, and Recordkeeping Requirements - startup, shutdown, and malfunction plan and reports	87
P-OT001	40CFR 63-LL.850(d)	Notification, Reporting, and Recordkeeping Requirements - excess emissions report	1-80
P-OT001	40CFR 63-LL.850(e)(1)	Notification, Reporting, and Recordkeeping Requirements - recordkeeping	89
P-OT001	40CFR 63-LL.850(e)(2)	Notification, Reporting, and Recordkeeping Requirements - recordkeeping	90
P-OT001	40CFR 63-LL.850(e)(3)	Notification, Reporting, and Recordkeeping Requirements - recordkeeping	91
C-ARB01	40CFR 63-LL.850(e)(4)	Notification, Reporting, and Recordkeeping Requirements - recordkeeping	46
P-OT001	40CFR 63-LL.850(e)(4)	Notification, Reporting, and Recordkeeping Requirements - recordkeeping	92
FACILITY	40CFR 63-RRR.1500(b)	Applicability	1-9
E-WCST1/-/J01	40CFR 63-RRR.1502(a)	Secondary Aluminum NESHAP - incorporation by reference	1-33
E-WCST1/-/J04	40CFR 63-RRR.1502(a)	Secondary Aluminum NESHAP - incorporation by reference	1-52
E-WCST1/-/J01	40CFR 63-RRR.1505(i)	Group 1 Furnace Emission Standards	1-34, 1-35
E-WCST1/-/J04	40CFR 63-RRR.1505(i)	Group 1 Furnace Emission Standards	1-53, 1-54
E-WCST1/-/J01	40CFR 63-RRR.1505(j)(1)	Emission Standards - In-line Fluxer	1-36
E-WCST1/-/J04	40CFR 63-RRR.1505(j)(1)	Emission Standards - In-line Fluxer	1-55
E-WCST1/-/J01	40CFR 63-RRR.1505(j)(2)	Emission Standards - In-line Fluxer	1-37
E-WCST1/-/J04	40CFR 63-RRR.1505(j)(2)	Emission Standards - In-line Fluxer	1-56
E-WCST1/-/J04	40CFR 63-RRR.1505(j)(3)	Emission Standards for Affected Sources and Emission Units - In-line fluxers using no reactive flux materials	1-57
E-WCST1/-/J04/01820	40CFR 63-RRR.1505(j)(3)	Emission Standards for Affected Sources and Emission Units - In-line fluxers using no reactive flux materials	50
FACILITY	40CFR 63-RRR.1505(k)	Secondary Aluminum Processing Unit Emission Standard	1-10

E-WCST1	40CFR 63-RRR.1505(k)(4)	Secondary Aluminum NESHAP - SAPU emission limits	1-25
E-WCST1	40CFR 63-RRR.1506(b)	Operating requirements - Labeling	1-26
E-WCST1/-/J01	40CFR 63-RRR.1506(d)	Operating requirements - Feed/charge weight	1-38
E-WCST1/-/J04	40CFR 63-RRR.1506(d)	Operating requirements - Feed/charge weight	1-58
E-WCST1/-/J04/01820	40CFR 63-RRR.1506(l)	Operating Requirements - In-line fluxer using no reactive flux material	51
FACILITY	40CFR 63-RRR.1506(p)	Operating requirements - Corrective Action	1-11
FACILITY	40CFR 63-RRR.1510(b)	Monitoring and Compliance Requirements - OM&M Plan	1-12
E-WCST1/-/J01	40CFR 63-RRR.1510(c)	Monitoring Requirements - Labeling	1-39
E-WCST1/-/J04	40CFR 63-RRR.1510(c)	Monitoring Requirements - Labeling	1-59
E-WCST1/-/J01	40CFR 63-RRR.1510(e)	Monitoring Requirements - Feed/charge weight	1-40
E-WCST1/-/J04	40CFR 63-RRR.1510(e)	Monitoring Requirements - Feed/charge weight	1-60
E-WCST1	40CFR 63-RRR.1510(j)	Monitoring Requirements - Total reactive flux injection rate	1-27
E-WCST1/-/J04/01820	40CFR 63-RRR.1510(m)	Monitoring and Compliance Requirements - In-line fluxers using no reactive flux	52
FACILITY	40CFR 63-RRR.1510(s)	Site-specific requirements for secondary aluminum processing units	1-13
E-WCST1	40CFR 63-RRR.1510(t)	Secondary Aluminum Processing Unit Emission Limits	1-28
E-WCST1/-/J01	40CFR 63-RRR.1510(u)	SAPU Individual Emission Unit Compliance Demonstration	1-41
E-WCST1/-/J04	40CFR 63-RRR.1510(u)	SAPU Individual Emission Unit Compliance Demonstration	1-61
E-WCST1/-/J01	40CFR 63-RRR.1511(a)	Site-specific test plan	1-42
E-WCST1/-/J04	40CFR 63-RRR.1511(a)	Site-specific test plan	1-62
FACILITY	40CFR 63-RRR.1511(b)	Initial Performance Test	1-14
FACILITY	40CFR 63-RRR.1511(c)	Test Methods	1-15
E-WCST1/-/J01	40CFR 63-RRR.1511(e)	Repeat Tests	1-43
E-WCST1/-/J04	40CFR 63-RRR.1511(e)	Repeat Tests	1-63
E-WCST1/-/J01	40CFR 63-RRR.1511(f)	Testing of Representative Emission Units	1-44
E-WCST1/-/J04	40CFR 63-RRR.1511(f)	Testing of Representative Emission Units	1-64
E-WCST1/-/J01	40CFR 63-RRR.1511(g)	Establishment of Monitoring and Operating Parameter Values	1-45
E-WCST1/-/J04	40CFR 63-RRR.1511(g)	Establishment of Monitoring and Operating Parameter Values	1-65
E-WCST1	40CFR 63-RRR.1512(e)	Performance Test and compliance demonstration requirements and procedures for Group 1	1-29

		furnaces w/out control devices	
E-WCST1	40CFR 63-RRR.1512(h)(1)	Performance Test/Compliance Demonstration Requirements and Procedures - In-line fluxer	1-30
E-WCST1/-/J04/01820	40CFR 63-RRR.1512(h)(1)	Performance Test/Compliance Demonstration Requirements and Procedures - In-line fluxer	53
E-WCST1	40CFR 63-RRR.1512(j)	Performance Test/Compliance Demonstration Requirements and Procedures - Secondary Aluminum Processing Unit	1-31
E-WCST1/-/J01	40CFR 63-RRR.1512(k)	Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.	1-46
E-WCST1/-/J04	40CFR 63-RRR.1512(k)	Performance Test/Compliance Demonstration Requirements and Procedures - Feed/Charge Weight Measurement.	1-66
E-WCST1	40CFR 63-RRR.1512(o)	Performance test/compliance demonstration requirements and procedures - Flux injection rate	1-32
E-WCST1/-/J01	40CFR 63-RRR.1512(r)	Performance test/continuous compliance requirements - labeling requirements	1-47
E-WCST1/-/J04	40CFR 63-RRR.1512(r)	Performance test/continuous compliance requirements - labeling requirements	1-67
E-WCST1/-/J01	40CFR 63-RRR.1513(b)	Equations for Determining Compliance	1-48
E-WCST1/-/J04	40CFR 63-RRR.1513(b)	Equations for Determining Compliance	1-68
FACILITY	40CFR 63-RRR.1515	Notifications	1-16
E-WCST1/-/J01	40CFR 63-RRR.1515(a)(6)	Notifications - anticipated date of performance test	1-49
E-WCST1/-/J04	40CFR 63-RRR.1515(a)(6)	Notifications - anticipated date of performance test	1-69
E-WCST1/-/J01	40CFR 63-RRR.1515(b)	Notifications - Notification of Compliance Status Report	1-50
E-WCST1/-/J04	40CFR 63-RRR.1515(b)	Notifications - Notification of Compliance Status Report	1-70

FACILITY	40CFR 63-RRR.1516	Secondary Aluminum MACT Reports	1-17
E-WCST1/-/J01	40CFR 63-RRR.1516(b)	Reports - Excess emission/summary report	1-51
E-WCST1/-/J04	40CFR 63-RRR.1516(b)	Reports - Excess emission/summary report	1-71
E-WCST1/-/J04/01820	40CFR 63-RRR.1516(b)(2)(vi)	Reports - Excess emissions/summary report	54
FACILITY	40CFR 63-RRR.1517	Secondary Aluminum MACT Records	1-18
E-WCST1/-/J04/01820	40CFR 63-RRR.1517(a)	General Records	55
FACILITY	40CFR 68	Chemical accident prevention provisions	1-19, 27
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	28
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	94
FACILITY	6NYCRR 201-3.2(c)(17)	Surface Coating Exemption	1
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	2, 29, 30
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	1-1
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	1-2
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
P-OT001	6NYCRR 209	Primary Aluminum Reduction Plants	102
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	95
FACILITY	6NYCRR 212	General Process Emission Sources	1-3
C-ARB01/-/N10	6NYCRR 212.10(c)	NOx and VOC RACT required at major facilities	49
FACILITY	6NYCRR 212.10(c)(1)	NOx and VOC RACT required at major facilities	16
P-OT001	6NYCRR 212.10(c)(4)(iii)	General Process Emission Sources - NOx and VOC RACT required at major facilities	63
FACILITY	6NYCRR 212.3(b)	General Process Emission Sources - emissions from existing emission sources	10
FACILITY	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or	1-4, 1-5, 1-81,

		modifications	1-82, 96, 97, 98, 99
FACILITY	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	13
FACILITY	6NYCRR 212.5(b)	Applicable emission standards	14
P-OT001	6NYCRR 212.5(d)	Applicable emission standards	59, 60, 61, 62, 103
FACILITY	6NYCRR 212.6(a)	General Process Emission Sources - opacity of emissions limited	15
B-OIL01/-/I03	6NYCRR 225-1.2(a)(2)	Sulfur in Fuel Limitations Post 12/31/87.	37
B-OIL01	6NYCRR 225-1.8(a)	Reports, sampling and analysis.	1-20
C-ARB01/-/N03	6NYCRR 225-1.8(a)	Reports, sampling and analysis.	1-23
B-OIL01/-/I03	6NYCRR 225-1.8(d)	Reports, sampling, and analysis	39
FACILITY	6NYCRR 226	Solvent Metal Cleaning Processes	17
B-OIL01/-/I03/0222H	6NYCRR 227.2(b)(1)	Particulate emissions.	1-21
B-OIL01/-/I03/0322H	6NYCRR 227.2(b)(1)	Particulate emissions.	1-22
B-OIL01	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	31
B-OIL01	6NYCRR 227-1.6(a)	Corrective Action.	32
B-OIL01	6NYCRR 227-1.6(b)	Corrective Action: Facility Shutdown.	33
B-OIL01	6NYCRR 227-1.6(c)	Corrective Action: Facility Shutdown Prohibitions.	34
B-OIL01	6NYCRR 227-1.6(d)	Corrective Action: Facility Shutdown Prohibitions.	35
B-OIL01	6NYCRR 227-1.7	General Emission Data.	36
FACILITY	6NYCRR 227-2	Reasonably available control technology for NOx	1-6
FACILITY	6NYCRR 257-3	Air Quality Standards - Particulates	1-7
FACILITY	6NYCRR 257-8	Air Quality Standards - Fluorides	20

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

40 CFR Part 68.
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, REYNOLDS METALS ST LAWRENCE REDUCTION PL has been determined to be subject to the following regulations:

40CFR 52-A.21
This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40CFR 63-A
The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that descibe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules. Section 63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

Section 63.7 covers performance testing requirements such as default notification and test deadlines; qualty assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also refered to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-LL.841
This condition lists the material used in the regulation that has been incorporated by reference.

40CFR 63-LL.843 (b)
This condition establishes that a dry coke scrubber must be used for paste production plants to control Polycyclic Organic Matter emissions and to what standards the control system should be designed and operated to.

40CFR 63-LL.846
This regulation allows the facility to average the emissions from the potlines.

40CFR 63-LL.846 (b) (2)
The regulation allows the plant to average the Total Fluoride and Polycyclic Organic Matter emissions across the potlines with a lower emission limit than that which is allowed on a per potline basis.

40CFR 63-LL.847 (b)

This condition requires the facility to prepare a site specific test plan. It must include the procedures and methods for the initial performance test and all subsequent testing.

40CFR 63-LL.847 (c)
This condition requires the preparation and submission of a site specific test plan. The test plan test plan sets forth how the facility will do the initial compliance test and all subsequent testing to show compliance with the limits in the regulation.

40CFR 63-LL.847 (d)
This condition outlines the requirements that the facility must follow, and where they can be found, when testing.

40CFR 63-LL.847 (d) (3)
This condition says the facility must use the average of all performance test runs conducted on the primary control device for a potline or bake furnace if more than one test has been done within a 12 month period.

40CFR 63-LL.847 (e) (6)
This condition states the facility must determine the aluminum production rate in pounds per hour for the calendar month that includes the 3 runs of the performance test. This information will be used along with the three runs of the performance test to determine if they are in compliance with the emission limits for Total Fluorides (TF) and Polycyclic Organic Matter (POM)

40CFR 63-LL.847 (f)
This condition establishes how initial compliance will be determined on new and existing paste production plants.

40CFR 63-LL.847 (h) (1)
This condition says the facility shall determine monitoring parameters that will ensure proper operation of the control devices for the potlines and anode bake furnaces.

40CFR 63-LL.847 (h) (2)
This condition requires the facility to determine the proper operating parameters on the control device for the paste production plant to ensure proper control of Polycyclic Organic Matter.

40CFR 63-LL.847 (h) (3)
This condition says the facility has the option of re-determining the operating limits on the control devices and to submitt them to the Department for approval. The new limits become effective upon approval of the Department.

40CFR 63-LL.848 (a)
This condition describes the monitoring frequency the facility shall use to show compliance with the Total Fluoride emission limits from the potlines.

40CFR 63-LL.848 (b)
This condition explains how the facility will use the test runs to show compliance with the emission limits.

40CFR 63-LL.848 (f)
This condition requires the facility to submit a plan showing how the processes and controls will be monitored to ensure complinace with the emission limits and monitoring requirements.

40CFR 63-LL.848 (g)
This conditions says the facility shall visually inspect the emissions from the stacks of the primary control devices daily for emissions that may indicate a problem.

40CFR 63-LL.848 (h)
This condition says that the facility must take corrective action according to the start up, shutdown, malfunction plan when a problem is found

40CFR 63-LL.848 (i)
This condition says that there is an allowance of six exceedances of monitoring parameters associated with a given control device per 6 month reporting period. Any exceedance beyond six is considered a violation.

40CFR 63-LL.848 (k)
This condition ensures the measuring devices used to show compliance are accurate.

40CFR 63-LL.849 (a)
This condition lists the test methods the facility is allowed to use to measure emissions.

40CFR 63-LL.849 (c)
This condition clarifies the use of the word "potroom" and "potroom group" in reference method 14 means "potline" for the purposes of this regulation.

40CFR 63-LL.849 (d)
This condition tells how to properly install the ductwork for method 14 testing on the potlines.

40CFR 63-LL.849 (e)
This condition outlines the way a facility can show an alternative test method is equivalent to the reference methods.

40CFR 63-LL.850 (a) (5)
This condition requires the facility to notify the Department when they are going to do the initial compliance test.

40CFR 63-LL.850 (a) (6)
This condition requires the facility to notify the Department of it's initial compliance status.

40CFR 63-LL.850 (b)
This condition explains how the facility shall report the initial and subsequent performance tests.

40CFR 63-LL.850 (c) (1)
This condition says the facility must outline the procedures in a plan to correct any problems with the

operation and control of the control devices.

40CFR 63-LL.850 (c) (2)
This condition says the facility must keep records of the steps taken within the Startup, Shutdown, and Malfunction plan to correct any problems with the equipment and report any actions taken outside the plan.

40CFR 63-LL.850 (d)
This condition says the facility must report emissions in excess of the established limits every six months or every 3 months if excess emissions require the increased reporting.

40CFR 63-LL.850 (e) (1)
This condition says all records must be maintained for 5 years.

40CFR 63-LL.850 (e) (2)
This condition establishes the choices of record keeping medium that can be used to keep records.

40CFR 63-LL.850 (e) (3)
This condition says reports can be submitted on paper or computer disk.

40CFR 63-LL.850 (e) (4)
This condition lists what records must be kept by the facility.

40CFR 63-RRR.1500 (b)
This condition lists the pieces of equipment that will have requirements within this regulation for facilities that emit more than 25 tons per year of hazardous air pollutants (HAPs) or 10 tons per year of a single HAP.

40CFR 63-RRR.1502 (a)
This condition refers to some published reference material used to establish some of the requiremnts in the regulation, and to be used to ensure proper pollution control at the facility.

40CFR 63-RRR.1505 (i)
This sets the emission limit for particulates emitted from a group 1 furnace processing only clean charge. These limits are the standard against which the calculated emissions emitted from the Secondary Aluminum Processing Unit (SAPU) are held to.

40CFR 63-RRR.1505 (j) (1)
This condition states a facility, with an in-line fluxer using a flux that produces hazardous air pollutant emissions, shall not emit more than 0.04 pounds of Hydrogen Chloride (HCl) per ton of aluminum fed to the furnace.

40CFR 63-RRR.1505 (j) (2)
This condition states a facility with an in-line fluxer using a flux that produces hazardous air pollutants, shall not emit more than 0.01 pounds of Particulate Matter (PM) per ton of aluminum fed to the furnace.

40CFR 63-RRR.1505 (j) (3)
This condition states a facility with an in-line fluxer using a flux that doesn't produce hazardous air pollutants is not subject to the hydrogen chloride and Particulate Matter limits in this section of the regulation.

40CFR 63-RRR.1505 (k)
This section of the secondary aluminum MACT contains the standards for secondary aluminum processing units (SAPU) which are defined as all the group 1 furnaces and in-line fluxers within the facility. Emission limits are provided in §1505(i) and (j) for each individual furnace or fluxer. The equations in this paragraph show how they are combined to arrive at an overall limit for the SAPU.

40CFR 63-RRR.1505 (k) (4)
This condition allows a facility to show compliance with the Secondary Aluminum Processing Unit (SAPU) emission limits by show that each affected emission source within the unit is in compliance with it's individual emission limit.

40CFR 63-RRR.1506 (b)
This condition states a facility must label the equipment with the proper operating procedures in order to maintain compliance with this regulation.

40CFR 63-RRR.1506 (d)
This condition states the facility must be able to accurately measure the weight of the aluminum feed/charge or throughput in order to determine compliance with emission limits.

40CFR 63-RRR.1506 (l)
This condition states a facility that uses non-reactive fluxes (fluxes that don't produce hazardous air pollutants) must continue to use non-reactive fluxes.

40CFR 63-RRR.1506 (p)
This condition states when a device is not operating properly, it must be fixed.

40CFR 63-RRR.1510 (b)
This condition states a facility must have a written plan to operate and maintain all the equipment properly and it must be approved by the department.

40CFR 63-RRR.1510 (c)
This condition states that the facility must make sure the labels are properly attached to the equipment. The labels help the operators run the machines properly.

40CFR 63-RRR.1510 (e)
This condition states accurate scales must be installed to measure the weight of aluminum produced. The weight of the aluminum produced will be used to calculate emissions to show compliance with the emission limits.

40CFR 63-RRR.1510 (j)
This condition states accurate scales must be installed to measure the weight of aluminum produced. The

weight of the aluminum produced will be used to calculate emissions to show compliance with the emission limits.

40CFR 63-RRR.1510 (m)
This condition states every 6 months a facility with an in-line fluxer using non-reactive flux must report "only non-reactive, non-HAP containing, non-HAP generating flux gases, agents, or materials were used at any time during this reporting period." HAP being Hazardous Air Pollutant.

40CFR 63-RRR.1510 (s)
This condition lists some of the information that can, and cannot, be included in the operation and maintenance plan for a Secondary Aluminum Processing Unit (SAPU).

40CFR 63-RRR.1510 (t)
This condition tells the facility how to calculate the particulate matter (PM), Hydrogen Chloride (HCl) and Dioxins/Furans (D/F) emissions for each secondary aluminum processing unit (SAPU)

40CFR 63-RRR.1510 (u)
If each group 1 furnace and in-line fluxer meets its respective emission limit, then the averaging provided for in §63.1505(k)(1) through (3) is unnecessary. If the emission averaging is unnecessary, then the daily calculations of the average per §63.1510(t) are unnecessary as well.

40CFR 63-RRR.1511 (a)
This conditions states the facility must show the Department how they are going to test the equipment before they do it.

40CFR 63-RRR.1511 (b)
This condition tells how the facility must do the initial pollutant testing on the exhaust from the equipment.

40CFR 63-RRR.1511 (c)
This condition states which test method must be used for each pollutant being tested.

40CFR 63-RRR.1511 (e)
This condition states every facility emitting more than 25 tons per year of hazardous air pollutants (HAPs) or 10 tons per year of a single HAP must test it's equipment every 5 years.

40CFR 63-RRR.1511 (f)
This condition states if a facility has identical equipment that is operated the same way, then only one has to be tested. That data can be used to represent the emissions from each similar unit.

40CFR 63-RRR.1511 (g)
This conditions states minimum and/or maximum operation parameters must be established using information from the performance stack tests.

40CFR 63-RRR.1512 (e)
This condition outlines the requirements for testing to show compliance with emission limits.

40CFR 63-RRR.1512 (h) (1)
This condition states where, and if, the in-line fluxers must test their emissions for levels of Hydrogen Chloride and Particulate Matter.

40CFR 63-RRR.1512 (j)
This condition states each furnace that melts scrap aluminum mixed with foreign materials, or clean aluminum with reactive fluxing, must test for Particulate Matter (PM) and Hydrogen Chloride (HCl), and Dioxins and Furans (D/F). A furnace that melts only clean aluminum and in-line fluxers, must test for PM and HCl.

40CFR 63-RRR.1512 (k)
This condition states the weight measurement of the amount of aluminum melted in the furnace or the amount of aluminum produced per fluxer can be used to show compliance with emission limits.

40CFR 63-RRR.1512 (o)
This section states the procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.

40CFR 63-RRR.1512 (r)
This condition states the labeling on the affected sources must be done properly and a certification stating so must be included in the notification of compliance status.

40CFR 63-RRR.1513 (b)
This condition states the equation shown must be used to show compliance with the emission limits for Particulate Matter, Hydrogen Chloride, and Dioxins/Furans.

40CFR 63-RRR.1515
Conditions under this regulation incorporate the requirements for various notifications to be submitted by the permittee for the Secondary Aluminum Production MACT.

40CFR 63-RRR.1515 (a) (6)
This condition requires the facility to notify the DEC or the EPA at least 60 days before they stack test any equipment or 30 days before they do a visible emissions test.

40CFR 63-RRR.1515 (b)
This condition outlines the time frames for the facility to submit the compliance status report and also outlines what information is to be included in the report.

40CFR 63-RRR.1516
Conditions under this section of the Secondary Aluminum MACT outline the reports required from subject facilities.

40CFR 63-RRR.1516 (b)
The facility is required to submit a compliance status report containing the information listed under this

citation.

40CFR 63-RRR.1516 (b) (2) (vi)
This condition states a facility that uses non-reactive flux in any of it's fluxers must report every 6 months that they have not used reactive flux in those same fluxers.

40CFR 63-RRR.1517
Conditions under this section of the secondary aluminum MACT outline the records that must be kept by subject facilities.

40CFR 63-RRR.1517 (a)
This condition states that all records being kept by the facility for this regulation must be kept available for 5 years.

40CFR 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

6NYCRR 201-3.2 (c) (17)
This condition says that as long as a surface coating source uses less than 25 gallons per month of coating and exhausts to an appropriate control device, then it is exempt from permitting.

6NYCRR 201-6.5 (c)
This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (c) (2)
This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 209
This condition says that as long as the facility is in compliance with the more stringent regulation of 40 CFR 63 subpart LL, then it is in compliance with this regulation.

6NYCRR 212
This condition requires the facility to follow the procedures in the particulate control Operation and Maintenance plan for each particulate control device. This will ensure the control devices keep the particulate emissions below 0.050 grains per dry standard cubic foot of exhaust gas and keeps the opacity below 20 percent for any 6 minute average.

6NYCRR 212 .10 (c)
This condition requires the facility to operate process N10 with an 81% control efficiency for Volatile Organic Compounds (VOCs), which is considered VOC RACT (Reasonably Available Control Technology).

6NYCRR 212 .10 (c) (1)
This condition requires the facility to operate the listed sources with emissions of VOCs below 3.0 pounds per hour. At this level, VOC RACT is not necessary.

6NYCRR 212 .10 (c) (4) (iii)
This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6NYCRR 212 .3 (b)
This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .5 (b)
This section establishes emission rates for a single control device that exits to the atmosphere through more than one emission point

6NYCRR 212 .5 (d)
This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6NYCRR 212 .6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)
This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 226
This regulation sets forth the equipment specifications, operating requirements and general requirements for facilities that perform solvent metal cleaning.

6NYCRR 227 .2 (b) (1)
This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 227-1.3 (a)
This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-1.6 (a)
This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)
This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)
This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)
This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 227-1.7
This condition requires the submission of test data, and the test methods used to aquire the data, that is acceptable to the Department.

6NYCRR 227-2
This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6NYCRR 257-3
This condition requires the facility to measure ambient air for total suspended particulates and compare the finding with the established National Ambient Air Quality Standards.

6NYCRR 257-8
This condition requires the facility to test for fluoride levels in and on forage to ensure compliance with the standards.

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

Compliance Certification
Summary of monitoring activities at REYNOLDS METALS ST LAWRENCE REDUCTION PL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	21
C-ARB01/-/N03	record keeping/maintenance procedures	1-24
P-DIG01/-/E02	intermittent emission testing	1-72
P-DIG01/-/E02	intermittent emission testing	1-73
P-OT001	record keeping/maintenance procedures	64
P-OT001	intermittent emission testing	1-74
P-OT001	intermittent emission testing	1-75
P-OT001	intermittent emission testing	67
P-OT001	intermittent emission testing	1-76
P-OT001	intermittent emission testing	69
P-OT001	intermittent emission testing	70
P-OT001	intermittent emission testing	1-77
P-OT001	intermittent emission testing	1-78
P-OT001	record keeping/maintenance procedures	1-79
P-OT001	record keeping/maintenance procedures	1-80
P-OT001	record keeping/maintenance procedures	89

P-OT001	record keeping/maintenance procedures	90
P-OT001	record keeping/maintenance procedures	91
C-ARB01	record keeping/maintenance procedures	46
P-OT001	record keeping/maintenance procedures	92
E-WCST1/-/J01	intermittent emission testing	1-35
E-WCST1/-/J04	intermittent emission testing	1-54
E-WCST1/-/J01	intermittent emission testing	1-36
E-WCST1/-/J04	intermittent emission testing	1-55
E-WCST1/-/J01	intermittent emission testing	1-37
E-WCST1/-/J04	intermittent emission testing	1-56
FACILITY	record keeping/maintenance procedures	1-10
E-WCST1	record keeping/maintenance procedures	1-26
E-WCST1/-/J01	record keeping/maintenance procedures	1-38
E-WCST1/-/J04	record keeping/maintenance procedures	1-58
E-WCST1/-/J01	record keeping/maintenance procedures	1-39
E-WCST1/-/J04	record keeping/maintenance procedures	1-59
E-WCST1/-/J01	record keeping/maintenance procedures	1-40
E-WCST1/-/J04	record keeping/maintenance procedures	1-60
E-WCST1	record keeping/maintenance procedures	1-27
E-WCST1/-/J01	record keeping/maintenance procedures	1-43
E-WCST1/-/J04	record keeping/maintenance procedures	1-63
E-WCST1	record keeping/maintenance procedures	1-29
E-WCST1	record keeping/maintenance procedures	1-31
E-WCST1	record keeping/maintenance procedures	1-32
E-WCST1/-/J01	record keeping/maintenance procedures	1-47
E-WCST1/-/J04	record keeping/maintenance procedures	1-67
E-WCST1/-/J01	record keeping/maintenance procedures	1-50
E-WCST1/-/J04	record keeping/maintenance procedures	1-70
E-WCST1/-/J01	record keeping/maintenance procedures	1-51
E-WCST1/-/J04	record keeping/maintenance procedures	1-71
E-WCST1/-/J04/01820	record keeping/maintenance procedures	54
E-WCST1/-/J04/01820	record keeping/maintenance procedures	55
FACILITY	record keeping/maintenance procedures	1-1
FACILITY	record keeping/maintenance procedures	1-2
FACILITY	record keeping/maintenance procedures	7
P-OT001	record keeping/maintenance procedures	102
FACILITY	record keeping/maintenance procedures	1-3
C-ARB01/-/N10	intermittent emission testing	49
FACILITY	intermittent emission testing	16
P-OT001	record keeping/maintenance procedures	63
FACILITY	intermittent emission testing	10
FACILITY	monitoring of process or control device parameters as surrogate	1-4
FACILITY	monitoring of process or control device parameters as surrogate	1-5
FACILITY	monitoring of process or control device parameters as surrogate	1-81
FACILITY	monitoring of process or control device parameters as surrogate	1-82
FACILITY	intermittent emission testing	96
FACILITY	intermittent emission testing	97
FACILITY	record keeping/maintenance procedures	98
FACILITY	intermittent emission testing	99
FACILITY	intermittent emission testing	13
P-OT001	record keeping/maintenance procedures	59
P-OT001	record keeping/maintenance procedures	60
P-OT001	record keeping/maintenance procedures	61
P-OT001	record keeping/maintenance procedures	62
P-OT001	record keeping/maintenance procedures	103
FACILITY	intermittent emission testing	15
B-OIL01/-/I03	work practice involving specific operations	37
B-OIL01	record keeping/maintenance procedures	1-20

C-ARB01/-/N03	monitoring of process or control device parameters as surrogate	1-23
B-OIL01/-/I03/0222H	intermittent emission testing	1-21
B-OIL01/-/I03/0322H	intermittent emission testing	1-22
B-OIL01	monitoring of process or control device parameters as surrogate	31
FACILITY	monitoring of process or control device parameters as surrogate	1-6
FACILITY	ambient air monitoring	1-7
FACILITY	record keeping/maintenance procedures	20

Basis for Monitoring

Condition #9- 6 NYCRR Part 212: In order to ensure proper operation and control of the particulate control devices in the facility, an Operation and Maintenance plan was submitted to the department for approval. The facility shall follow the plan and report any exceedances of any monitored parameters semiannually. Operation of these control devices will ensure the affected sources comply with the 0.050 grains per dry standard cubic foot emission limit and the 20% opacity limit. Compliance testing will be done as requested by the Department if and when it becomes necessary to show the control device is operating as designed.

Condition #10: Normal operation of the associated emission sources should not generate emissions above the specified limit. A change in the operation or process materials will require testing to show the sources will still be within specified limits. This is also true for the following conditions and their associated emission sources: Conditions 13, 15, 16, 31, 37, 47, 76, 96, 97, and 99.

Condition #11, #12, #100, and #101- 6 NYCRR Part 212.4(a): The North and South wet scrubbers were installed to control Sulfur emissions. Computer monitoring of the Liquor being used in the scrubbers for pH and the liquor levels will ensure the acid gasses are removed at the maximum rate. The pH range and the liquor level range were established through testing and manufacturer's recommendations.

Condition #18 6 NYCRR Part 227-2: The facility has taken a 198000 pound per year cap on NOx emissions as submitted in the 1994 NOx RACT plan to cap out of 6 NYCRR 227-2. Calculations of emissions will be done monthly and rolled into the yearly average (previous 11 months plus the one just calculated) and reported semiannually.

Condition #19- 6 NYCRR Part 257-3: The facility must monitor ambient air levels of suspended particulates based on past practices. The facility has requested to discontinue ambient testing and will be discussed in depth in the future. The requirement to monitor came at a time when the facility had less particulate control than they have now, and the fact that they decided to monitor ambient levels at that time instead of increasing particulate controls. In the meantime, they will continue to monitor as required for a level III area.

Condition #20- 6 NYCRR Part 257-8: In the past, there was problem with high levels of Fluoride in forage in the area downwind of the facility. Due to the new Primary Aluminum regulations, fluorides are now better controlled today. The discontinuation of Fluoride in vegetation sampling is being evaluated by the concerned parties. In the meantime, sampling will continue as it has before.

Condition #40 & #41 6 NYCRR Part 227.2(b)(1): These conditions come from an outdated regulation that was still in the NY State Implementation Plan and EPA requires the emission limits of the

affected sources to be as shown. Once a SIP revision is done, the emission limit will be as it currently reads in the regulation (227-1.2(a)2).

Condition #48- 40 CFR 52.21, Subpart A: The amount of 1.5% sulfur 6 oil combusted in the HTM burner is limited to 232,000 gallons to avoid Prevention of Significant Deterioration (PSD) requirements. At the time of public notice (April 10, 2002) the HTM burner does not operate properly on #6 oil. The facility current only operates the burner using natural gas and will notify the Department upon completion and testing of the #6 oil system.

Condition #49- 6 NYCRR Part 212.10(c): The facility installed a nitrogen purge coal tar pitch unloading system, including a condenser tank, which reduced and controlled VOC emissions by at least 81%. This is considered RACT (Reasonably Available Control technology) for VOC emissions. Normal operation will yield the proper control. Any changes will require the facility to retest the system to so compliance.

Condition #54- 40 CFR 63.1512(h)(1), Subpart RRR: A new in-line fluxer was installed at the facility. EPA has made an applicability determination about the fluxer for the Department regarding the applicability of 40 CFR 63 subpart RRR for secondary aluminum processing. It was determined that the regulation applied to the fluxer at startup. The fluxer is currently permitted to only use non-HAP (Hazardous Air Pollutant) generating, non-HAP containing, non-reactive gas to flux with.

Conditions #57 & #58- 40 CFR 52.21, Subpart A: These caps were established to avoid the applicability of 40 CFR 52.21 for Prevention of Significant Deterioration (PSD) for this new emission source. The particulate control system will be operated according to the Operation and Maintenance plan. Any changes in the process or controls will require re-testing to show compliance.

Conditions #59, #60, #61, #62, and #103- 6 NYCRR Part 212.5(d) : The facility must submit BACT (Best Available Control Technology) analysis for the contaminants listed being emitted from the potlines to show whether or not there is a technologically or economically feasible way to control their emissions any further than they are now. The analysis must be done within 120 days of the permit issuance date.

Condition #63- 6 NYCRR Part 212.10(c)(4)(iii): The facility must submit a VOC RACT (Reasonably Available Control technology) analysis to show whether or not there is an economically or technologically feasible way to control Volatile Organic Compound emissions from the potlines. It must be submitted within 120 days of the the permit issuance date.

Conditions #64- #68 & #87- #91- 40 CFR 63.846, Subpart LL: The facility must average it's emissions of Fluorides and Polycyclic Organic Matter (POMs) across all three potlines due to the common emissions through the two scrubbers. The facility was unable to adequately test emissions for each separate potline due to the primary control configuration. Averaging across three potlines for a Sodherberg plant reduces the allowable emissions according to the table in the regulation to 2.4 pounds per Ton of Aluminum Produced (TAP) for Fluorides and 3.8 pounds per TAP for POMs. The regulation prohibits the averaging of the two different contaminants together.

Conditions #69, #92, #73 & #74: These require the periodic testing for POMs and Fluorides to show compliance initially and subsequently according to the schedule required in the regulation.

Condition #98- 6 NYCRR Part 212.4(a): The facility is required to operate the facility according to the Best Practices Plan (BPP) in order to minimize secondary emissions from the potlines. This is a requirement from an old consent order the facility was under. The BPP is to be revised as needed to reflect modifications and improvements or the availability of new information.

Condition #102- 6 NYCRR Part 209: As long as this facility is in compliance with the more stringent regulation of 40 CFR 63 subpart LL, then it will be in compliance with this regulation.

Condition #1-2 40 CFR 63-RRR.1505 (k): The facility operates two Secondary Aluminum Processing units (SAPU). One consists of an Alcan Compact Degassing unit (ACD) using only non-reactive flux. The remaining existing equipment constitutes the other SAPU. Using the data from the stack testing, and the procedures outlined in the operation, maintenance and monitoring plan (OM&M), the SAPU emission limits for Particulate matter (PM) and Hydrogen Chloride (HCl) must be calculated using the appropriate equations.

Condition #1-3 40 CFR 63-RRR.1500(b): The plant operates at least one of the listed affected sources and therefore, establishes applicability.

Condition #1-4 40 CFR 63-RRR.1506(p): The plant must operate the equipment within the proper limits. If there is a time when measurements are outside established limits, then they must fix what caused the problem, and take action to ensure it doesn't happen again.

Condition #1-5 40CFR 63-RRR.1510(b): The plant has submitted an acceptable operation, maintenance and monitoring (OM&M) plan. Operation must conform to the plan.

Condition #1-6 40CFR 63-RRR.1510(s): The plant has submitted an acceptable OM&M Plan with the proper requirements to show compliance of the SAPU.

Condition #1-7 40CFR 63-RRR.1511 (b) The site specific test plan was submitted and approved. Testing showed emissions were in compliance.

Condition #1-8 40CFR 63-RRR.1511(c) Testing was done using the proper methods. D/F testing and limits do not apply due to the facility charging with only "clean charge".

Condition #1-9 40CFR 63-RRR.1515 All the proper notifications were made by the facility. Any future changes in operation or equipment will require proper notification.

Condition #1-10 40CFR 63-RRR.1516 : A Start-up, shutdown, malfunction plan was submitted and accepted. It outlines the steps facility personnel must do to keep pollution to minimum during those time periods. Also, reports must be submitted to show this has been done.

Condition #1-11 40CFR63-RRR.1517: The regulation requires records be kept for a period of 5 years. The information can be kept on different storage media as long as the software is compatable with the software used by the EPA or DEC.

Condition #1-12 40CFR68: The regulation requires the facility to submit information to the EPA to show compliance with the bulk chemical storage tank safety requirements. This is a regulation that has not been delegated to NY State.

Condition #1-13 40 CFR 63-RRR.1505(k)(4): The facility has the option to show compliance with the Secondary Aluminum Production Unit (SAPU) emission limits by showing that each emission unit is in compliance with the individual emission limits. At this time, the facility is calculating the SAPU emissions from the established emission factors.

Condition #1-14 40 CFR 63-RRR.1506(b): Each group 1 furnace and in-line fluxer at the plant must be properly labeled according to the regulation. A certification must be submitted to the Department every six months stating the equipment is labeled properly.

Condition #1-15 40CFR 63-RRR.1510(j): The facility must install, calibrate and maintain the proper equipment to measure the flux injection rate to the furnaces and in-line fluxers. This equipment has been installed, the measurements have been made during the performance test, and the equipment is being operated according to the approved Operation, Maintenance, and Monitoring plan.

Condition #1-16 40CFR 63-RRR.1510(t): This condition outlines the procedures to be used to determine the three day average emissions of Particulates and Hydrogen Chloride from the Secondary Aluminum Processing Unit (SAPU). The Dioxin and Furan emission limits do not apply because the facility only uses "clean charge".

Condition #1-17 40CFR 63-RRR.1512(e): The regulation requires the plant submit the Site Specific Monitoring Plan to show compliance with the HCl and Particulate emission limits for the group 1 furnaces at the plant. The plant processes only "Clean" charge so the D/F limits do not apply. The Plan has been reviewed and approved.

Condition #1-18 40CFR 63-RRR.1512(h)(1): Emission testing for the in-line fluxers shall measure emission of PM and HCl. The Alcan Compact Degassing (ACD) does not use reactive flux, therefore it does not need to be tested for emissions of HCL and PM under this regulation.

Condition #1-19 40CFR 63-RRR.1512(j): Performance testing was completed as necessary on all affected sources of the SAPU. The emission factors are then used to calculate and determine compliance with the emission limits for the SAPU.

Condition #1-20 40CFR 63-RRR.1512(o): These procedures were used during the performance testing to establish the flux injection rate.

Condition #1-21 40 CFR 63-RRR.1502(a): This lists the material incorporated by reference into the regulation to be used as applicable. This is the same as condition 1-40.

Condition #1-22 40 CFR 63-RRR.1505(i): The furnaces at the Reynolds Plant process only clean charge, so the Dioxin and Furan limits do not apply. This is the same as condition 1-41.

Condition #1-23 40 CFR 63-RRR.1505(i): This regulation establishes the Particulate emission limits

for the furnaces at the plant. The plant has opted to show compliance using the production weight production rather than feed/charge weight. This is the same as condition 1-42.

Condition #1-24 40 CFR 63-RRR.1505(j)(1): Using the HCl emission limits for in-line fluxers in this regulation, the facility can determine what the emissions standards are for the SAPU. This condition is the same as condition #1-43.

Condition #1-25 40 CFR 63-RRR.1505(j)(2): Using the Particulate emission limits for in-line fluxers in this regulation, the facility can determine what the emissions standards are for the SAPU. This condition is the same as condition #1-44.

Condition #1-26 40 CFR 63-RRR.1506(d): The facility must operate and maintain any weighing and measuring equipment according to the OM&M plan. The facility has chosen to show compliance with the emission limits using the weight of production of Aluminum. Same as condition #1-46.

Condition #1-27 40CFR 63-RRR.1510(c): The facility will inspect the labels on the secondary aluimnum processing equipment at least once per month as required under the regulation. The labels must be intact and legible. Same as condition #1-47.

Condition #1-28 40CFR 63-RRR.1510(e): The regulation requires the facility properly maintain and operate the weight measurment devices used at the facility. This is the same as condition #1-48.

Condition #1-29 40CFR 63-RRR.1510(u): The facility may choose to show that each individual emission unit within the SAPU is in compliance with the it's emission limits, therefore showing the SAPU emissions are in compliance. This is the same as condition #1-49.

Condition #1-30 40CFR 63-RRR.1511(a): The site specific test plan submitted to the Department to comply with this regulation also met the requirements of 40 CFR 63.7(c). This is also the same as condition #1-50.

Condition #1-31 40CFR 63-RRR.1511(e): The facility is required to, by regulation, stack test the equipment every 5 years. This is the same as condition #1-51.

Condition #1-32 40CFR 63-RRR.1511(f): This condition allowed the facility to reduce the amount of testing by allowing them to test 1 unit of any number of similar sources, as long as they met the criteria of "similar source". This is the same as condition #1-52.

Condition #1-33 40CFR 63-RRR.1511(g): The facility established any minimum and maximum operating parameter values during the performance test and reported them in the notice of compliance status report. This is the same as condition #1-53.

Condition #1-34 40CFR 63-RRR.1512(k): During each of the three performance test runs, the facility measured and recorded the weight of production from the emission units. This is the same as condition #1-54.

Condition #1-35 40CFR 63-RRR.1512(r): The facility submitted to the Department, the information

required under 40 CFR 63.1515(b)(3) in the notice of compliance status report. This is the same as condition #1-55.

Condition #1-36 40CFR 63-RRR.1513(b): The emissions of Particulates and HCl were figured using the equation listed. D/F emissions were not tested because the facility only processes clean charge. This is the same as condition #1-56.

Condition #1-37 40CFR 63-RRR.1515(a)(6): Proper notification was given to the Department before the stack testing. Future testing will require the same notification. This is the same as condition #1-57.

Condition #1-38 40CFR 63-RRR.1515(b): The compliance status report has been submitted and contains all the necessary information. This is the same as condition #1-58.

Condition #1-39 40CFR 63-RRR.1516(b): The regulation requires all semiannual reports be submitted with the proper information to show compliance within 60 days after the end of each 6 month period. However, 6 NYCRR 201 requires all reports be submitted within 30 days after each six month period. The facility will have to comply with the more stringent 30 days. This is the same as condition #1-59.

Condition #1-45 40 CFR 63-RRR.1505(j)(3): The Alcan Compact Degasser (ACD) does not have emission limts under this regulation as long as they use only non-reactive, non-HAP producing flux.