Colorado Department of Public Health and Environment

OPERATING PERMIT

Golden Aluminum, Inc.
First Issued November 1, 1999
Renewed: May 1, 2010
Last Revised: January 11, 2011

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Golden Aluminum Inc.	OPERATING PERMIT NUMBER
FACILITY ID:	1230089	**96OPWE125**
RENEWED:	May 1, 2010	
EXPIRATION DATE:	May 1, 2015	
MODIFICATIONS:	See Appendix F of Permit	

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:

Golden Aluminum Inc.
1405 East 14th Street
Fort Lupton, CO 80621

PLANT SITE LOCATION:

1405 East 14th Street
Fort Lupton, CO 80621
Weld County

INFORMATION RELIED UPON

Renewal Operating Permit Application Received:	July 1, 2009
And Additional Information Received:	April 1 and 6, 2009

Nature of Business:	Aluminum Sheet Manufacturing
Primary SIC:	3353

RESPONSIBLE OFFICIAL

Name:	Mark Selepack
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FACILITY CONTACT PERSON

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SUBMITTAL DEADLINES

Semi-Annual Monitoring Periods:	May 1 - October 31, November 1 - April 30
Semi-Annual Monitoring Report:	Due on December 1, 2010 & June 1, 2011 and subsequent years
First Annual Compliance Period:	May – October 31
Subsequent Annual Compliance Periods:	November 1 to October 31
Annual Compliance Certification:	Due on December 1, 2010 and subsequent years

Note that the Semi-Annual Monitoring Report and the Annual Compliance Certification must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility is an aluminum sheet manufacturing plant, which falls into the Standard Industrial Classification 3353. Golden Aluminum manufactures coiled aluminum sheet by recycling Rigid Can Stock (RCS) using prime aluminum and other alloying materials. The RCS is shredded to expose the coating, then sent to a delaquering kiln to remove the coatings. The shreds are then melted in two of three furnaces, plant scrap is melted in any of the three furnaces. The shreds are then mixed with prime aluminum and alloying elements. The molten aluminum goes through a series of degassing boxes. The aluminum is solidified at the caster, then the cast sheet is sent to the hot mill where it is coiled then to either the annealing processes or to the cold mill. The coils are processed to customer specifications then sent to the tab wash line or coating line. After the tab wash the coils are then slit and packaged. After the coating line the coils are cured in a five oven process, cooled and lubricated. The coils are then slit and packaged.

The facility is located in Fort Lupton, Weld County. This facility is located in an Area classified as attainment for all pollutants except ozone. It is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.1.

There are no affected states within 50 miles of the plant. The following Federal Class I designated area is within 100 kilometers of the plant: Rocky Mountain National Park.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. This Operating Permit incorporates the applicable requirements (except as noted in Section II) from the following Colorado Construction Permit(s): 03WE0032 (facility wide permit issued March 21, 2003 incorporating the provisions of 82WE250-2, 3, 4, 6 thru 8, & 12, 84WE342, 90WE247, and 91WE864).

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section IV – Conditions 3.d, 3.g (last paragraph), 14 and 18 (as noted).

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

2. Alternate Operating Scenarios

2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.

2.1.1 No separate operating scenarios have been specified.

3. Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD)

3.1 Based on the information provided by the applicant, this source is categorized as a minor stationary source (Potential to Emit < 250 tons/yr) for PSD as of the issuance date of this permit. Any future modification at this facility which is major by itself (i.e. Potential to Emit of $\geq$ 250 tons/year) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

In addition, future modifications at this facility may result in the facility being classified as a major stationary source for PSD. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

3.2 Based on the information provided by the applicant, this facility is categorized as a minor stationary source (Potential to Emit of neither VOC nor NO_X $\geq$ 100 Tons/Year) for NANSR. Any future modification at this facility, which is major by itself (Potential to Emit $\geq$ 100 TPY of either VOC or NOx) may result in the application of the NANSR review requirements.

In addition, future modifications at this facility may result in the facility being classified as a major stationary source for NANSR. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for either VOC or NO_X may result in the application of the NANSR review requirements.

3.3 There are no other Operating Permits associated with this facility for purposes of determining applicability of NANSR or PSD review regulations.

4. Accidental Release Prevention Program (112(r))

4.1 Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Summary of Emission Units

5.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Startup Date	Pollution Control Device
S001	016	P001	Three Modified Miller Shredders and Particle Separator Drop Box, Design Rated at 3 TPH each, Baghouse Controlled.	1990	Day Co., IG013831 Baghouse
S002	002	P002	Custom Apros Delaquering Kiln, 14 MMBtu Natural Gas Fired Burner, Design Rated at 10 TPH, SN: BIN221, Controlled by a Multicyclone, a Thermal Oxidizer, and a Lime Injected Baghouse.	1983 Lime-Injected Baghouse 2002/2003	Apros Thermal Oxidizer and Lime Injected Baghouse
S003	003	P003	Custom Melter # 1 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.	1982 Burners Replaced 2006	Uncontrolled*
S004	003	P004	Custom Melter # 2 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.	1982 Burners Replaced 2006	Uncontrolled*
S005	003	P005	Gillespie/Powers Melter # 3 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH, SN: 0286.	1984 Burners Replaced 2006	Uncontrolled*
S006	019	P006	Melt Area Baghouse for Sidewell Melting, Degassing and Filtration, Design Rated at 15 TPH.	1992	Interel Co., #2.5/7.5/2.0 Lime-Injected Baghouse
S008	006	P008	Hot Mill, Design Rated at 13.5 TPH, Controlled with an Air Purifier Centrifugal Separator.	1982	Busch Company, 42" Purifier
S009	008	P009	Two Custom Secowarwick Annealing Furnaces, Two U-Tube 17.5 MMBtu Natural Gas Fired Burners, Design Rated at 78 TPH each.	1982	Uncontrolled
S010	007	P010	Davy-McKee Cold Rolling Mill 2-STD, Design Rated at 35 TPH, Controlled with a Air Purifier Centrifugal Separator.	1982	Busch Company, 54" Purifier
S011	018	P011	Custom Hunter Coil Coating Line, 26.1 MMBtu Grace Tec Natural Gas Fired Burner, Controlled with a Thermal Oxidizer.	1982 Thermal Oxidizer 1996 Line Speed Increased 2002/2003	Grace Tec Systems: Shadow TM S-144 Thermal Oxidation Unit

*Emissions from the melter sidewells are vented to the Melt Area Baghouse (S006)

6. Compliance Assurance Monitoring (CAM)

6.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

S002 – Delacquering Kiln (Condition 2.7)
S006 – Melt Area Baghouse (Condition 4.5)

See Section II, Condition 11 for specific CAM requirements.

SECTION II - Specific Permit Terms

1. S001 - Prebreakers, Shredders and Particle Separator Drop Out Box w/Baghouse

Parameter	Permit Condition Number	Limitations (for all three together) Short Term	Long Term	Compliance Emission Factor	Monitoring Method	Interval
PM	1.1	**For each shredder:** 7.09 lbs/hr	9.80 tons/yr	0.522 lb/Ton Al Processed	Recordkeeping and Calculation and Baghouse Maintenance	Monthly
PM_{10}		NA	9.80 tons/yr	0.522 lb/Ton Al Processed		See Conditions 1.1.3 and 1.1.4
Production Rate	1.2	NA	37,500 tons/yr	NA	Recordkeeping	Monthly
Opacity	1.3	Except as provided for in Condition 1.4, below, not to exceed 20%		NA	Visible Emission Observations	Daily
	1.4	During certain operating conditions, not to exceed 30%				

1.1 Particulate Matter emissions are subject to the following limitations:

1.1.1 PM emissions **from each shredder** shall not exceed the short term (lbs/hr) limit stated above (Colorado Regulation No. 1, Section III.C.1.a). In the absence of credible evidence to the contrary, compliance with the short term PM limit is presumed provided that the requirements in Conditions 1.1.3 and 1.1.4 are met.

Note that the numeric PM standards were determined using the design rate for the shredders (3 tons/hr per shredder) in the following equation:

$PE = 3.59 \times (P)^{0.62}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

1.1.2 Emissions of PM and PM_{10} **from all three shedders together** shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 90WE247) as modified under the provisions of Section I, Condition 1.3). Monthly emissions **from all three shredders together** shall be calculated by the end of the subsequent month, using the emission factors in the above table (from 10/29/02 synthetic minor (HAP) permit application – factors based on calculation) in the following equation:

$$\text{Tons/mo} = \frac{\text{Quantity of Al processed (tons/mo)} \times \text{EF (lbs/ton Al)}}{\text{2000 lbs/ton}}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

1.1.3 Routine maintenance of the baghouse shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

A visual emission observation of each stack shall be conducted daily. Should visible emissions, other than steam, be observed, the source shall follow the steps in 1.1.3.1 and 1.1.3.2 and record in a log the opacity observations and any action taken as a result of the observations.

The baghouse pressure drop shall be monitored and recorded daily. Should the daily recorded baghouse pressure drop be outside the manufacturer's recommendations, the source shall follow the steps in 1.1.3.1, 1.1.3.4, and 1.1.3.5, within one hour of the recorded pressure drop.

1.1.3.1 Verify that the process and control equipment are operating properly and perform any maintenance or adjustments needed to minimize visible emissions.

1.1.3.2 If, after maintenance and/or adjustments have been made, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the twenty percent (20%) opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

1.1.3.3 Perform any maintenance or adjustments needed on the baghouse.

1.1.3.4 If the baghouse pressure drop remains outside of manufacturer's specifications, the baghouse shall be internally inspected for integrity and overall mechanical efficiency. Necessary repairs shall be made prior to bringing the equipment back on line. Any action taken as a result of pressure drop shall be recorded in a daily log.

1.1.4 The baghouse shall be inspected for bag integrity and overall mechanical efficiency annually. Powdered dye tests shall be performed as necessary to identify faulty bags.

Necessary repairs shall be made prior to bringing the equipment back on line. An adequate inventory of replacement bags and parts shall be maintained on site.

1.2 The processing of recycled aluminum shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 90WE247) as modified under the provisions of Section I, Condition 1.3). Processing rates **from all three shredders together** shall be measured and recorded each month, and made available to the Division for inspection upon request. Monthly quantities of material processed shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.

1.3 Except as provided for in Condition 1.4, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (Construction Permit 90WE247, and Colorado Regulation No. 1, Section II.A.1) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 1.1.3.

1.4 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 1.1.3.

2. S002 - Delaquering Kiln w/ Multicyclone, Thermal Oxidizer, and Lime Injected Baghouse

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
PM	2.1	14.97 lbs/hr	1.54 tons/yr	Operating: 0.08 lb/ton Al Idle: 7.6 lb/MMscf	Recordkeeping and Calculation and Control Equipment Maintenance	Monthly See Conditions 2.1.3 through 2.1.5
PM_{10}		NA	1.54 tons/yr	Operating: 0.08 lb/ton Al Idle: 7.6 lb/MMscf		
NOx		NA	4.97 tons/yr	Operating: 0.24 lb/ton Al Idle: 100 lb/MMscf		
CO		NA	3.33 tons/yr	Operating: 0.157 lb/ton Al Idle: 84 lb/MMscf		
VOC		NA	2.28 tons/yr	Operating: 0.12 lb/ton Al Idle: 5.5 lb/MMscf		
Lead		NA	0.32 tons/yr	Operating: 0.0167 lb/ton Al Idle: Neg.		
Aluminum Consumption	2.2	NA	37,500 tons/yr	NA	Recordkeeping	Monthly
Fuel Use	2.3	NA	60.0 MMscf/yr	NA	Fuel Allocation (See Appendix G)	Monthly
Opacity	2.4	Except as provided for in Condition 2.5, below, not to exceed 20%		NA	Visible Emission Observations	Daily
	2.5	During certain operating conditions, not to exceed 30%				
MACT Requirements	2.6	5.0 µg of D/F TEQ per Mg of feed/charge		See Conditions 2.6 and 10		
CAM	2.7	See Conditions 2.7, 11 and Appendix H				

2.1 Emissions of air pollutants are subject to the following limitations:

2.1.1 PM emissions shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.a). In the absence of credible evidence to the contrary, compliance with the short term PM limit is presumed provided that the requirements in Condition 2.1.4 are met.

Note that the numeric PM standards were determined using the design rate for the kiln (10 tons Al/hr) in the following equation:

$PE = 3.59 \times (P)^{0.62}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

2.1.2 Emissions of air pollutants shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-2), as modified under the provisions of Section I, Condition 1.3). Monthly emissions shall be calculated by the end of the subsequent month using the above emission factors in the above table (Operating factors: NO_X, CO, VOC and Pb from 4/5/99 revised Title V application (calculated), PM and PM_{10} from 10/31/03 Title V renewal application (based on stack test), Idle factors: from AP-42, Section 1.4 (3/98), Tables 1.4-1 and 1.4-2) in the following equations:

While kiln is delaquering:
tons/month = Throughput (tons Al/month) x EF (lb/tons Al) / 2000 lbs/ton

While kiln is idle (just burning natural gas):
tons/month = Throughput Idle time only (MMscf/month) x EF (lb/MMscf) / 2000 lbs/ton

Total emissions = operating emissions + idle emissions

99.0% control efficiency for PM may be applied provided the baghouse is operated in accordance with the requirements in Condition 2.1.4, below.

Monthly emissions shall be used in a twelve-month rolling total to monitor compliance with the annual limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data. Records of calculations shall be maintained for Division inspection upon request.

2.1.3 Routine maintenance of the thermal oxidizer shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

2.1.4 Routine maintenance of the baghouse shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

A visual emission observation of each stack shall be conducted daily. Should visible emissions, other than steam, be observed, the source shall follow the steps in 2.1.4.1 and 2.1.4.2 and record in a log the opacity observations and any action taken as a result of the observations.

The baghouse pressure drop shall be monitored and recorded daily. Should the daily recorded baghouse pressure drop be outside the manufacturer's recommendations, the source shall follow the steps in 2.1.4.1, 2.1.4.3, and 2.1.4.4, within one hour of the recorded pressure drop.

2.1.4.1 Verify that the process and control equipment are operating properly and perform any maintenance or adjustments needed to minimize visible emissions.

2.1.4.2 If, after maintenance and/or adjustments have been made, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the twenty percent (20%) opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

2.1.4.3 Perform any maintenance or adjustments needed on the baghouse.

2.1.4.4 If the baghouse pressure drop remains outside of manufacturer=s specifications, the baghouse shall be inspected for bag integrity and overall mechanical efficiency. Necessary repairs shall be made prior to bringing the equipment back on line. Any action taken as a result of baghouse pressure drop shall be recorded in a daily log, to be made available for Division inspection upon request.

2.1.5 The baghouse shall be inspected for bag integrity and overall mechanical efficiency annually. Powdered dye tests shall be performed as necessary to identify faulty bags. Necessary repairs shall be made prior to bringing the equipment back on line. An adequate inventory of replacement bags and parts shall be maintained on site.

2.2 The consumption of aluminum shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-2), as modified under the provisions of Section I, Condition 1.3). Consumption rates shall be measured and recorded each month. Monthly consumption rates shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data. Records of actual consumption shall be maintained for Division inspection upon request.

2.3 The consumption of natural gas shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-2) as

modified under the provisions of Section I, Condition 1.3). Natural gas consumption rates shall be calculated by allocation as specified in Appendix G and recorded each month. Monthly fuel consumption shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data. Records of actual consumption shall be maintained for Division inspection upon request.

2.4 Except as provided for in Condition 2.5, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-2), and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 2.1.4.

2.5 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 2.1.4.

2.6 The delacquering kiln is subject to 40 CFR Part 63, Subpart RRR as set forth in Condition 10 of this permit.

2.7 This source is subject to the CAM requirements with respect to the facility wide HAP limits (Condition 9) as set forth in Condition 11 of this permit.

3. S003, S004 and S005 - Melters #1, #2 and #3 - Main Hearths

Unless Otherwise Specified the Limitations Apply to all Three Melters Combined

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
PM	3.1	**For each Melter:** 19.20 lb/hr	37.6 tons/yr	0.611 lbs/ton Al	Recordkeeping and Calculation	Monthly
PM_{10}		NA	37.6 tons/yr	0.611 lbs/ton Al		
NO_X	3.2.	NA	70.6 tons/yr	See Condition 3.2	Recordkeeping and Calculation	Monthly
CO	3.3.	NA	23.85 tons/yr	84 lb/MMscf	Recordkeeping and Calculation	Monthly
VOC			8.06 tons/yr	0.131 lbs/ton Al		
Aluminum Consumption	3.4.	NA	123,100 tons/yr	NA	Recordkeeping	Monthly
Fuel Use	3.5	NA	568 MMscf/yr	NA	Fuel Meter	Monthly
Opacity – **Applies to Each Melter**	3.6	Except as provided for in Condition 3.7, below, not to exceed 20 %		NA	Visible Emission Observations	Weekly
	3.7	During certain operating conditions, not to exceed 30%				
MACT Requirements	3.8	**From Sidewells, When Processing Coated Charge:** 15 µg D/F TEQ per Mg of feed/charge		See Conditions 3.8 and 10		

3.1 Particulate Matter emissions are subject to the following limitations:

3.1.1 PM emissions **from each melter** shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.a). In the absence of credible evidence to the contrary, compliance with the particulate matter standard **for each melter** is presumed based on maintaining a record of calculation demonstrating that with the combination of the emission factor and the quantity of aluminum charged to each melter precludes noncompliance. A copy of the calculation shall be made available for Division review upon request.

Note that the numeric PM standards were determined using the design rate for the melters (14.95 tons Al/hr per melter) in the following equation:

$PE = 3.59 \times (P)^{0.62}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

3.1.2 PM and PM_{10} emissions **from all melters (main hearths) together** shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342), as modified under the provisions of Section I, Condition 1.3 to reflect requested emissions on the APEN submitted July 27, 2006). Monthly emissions **from all melters (main hearths) together** shall be calculated by the end of the subsequent month, using the above emission factors (based on performance test data) in the following equation:

$$\text{Tons/mo} = \frac{\text{Quantity Al processed (tons/mo) x EF (lbs/ton Al)}}{\text{2000 lbs/ton}}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.2 Emissions of NO_X **for all melters combined** shall not exceed the limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342), as modified under the provisions of Section I, Condition 1.3 to reflect requested emissions on the APEN submitted July 27, 2006). Monthly emissions **from all melters together** shall be calculated by the end of the subsequent month, using the appropriate emission factor from the table below in the following equation:

$$\text{Tons/month} = \frac{\text{Natural Gas Consumption (MMscf/month) x EF (lb/MMscf)}}{\text{2000 lbs/ton}}$$

The appropriate emission factor shall be determined based on the level of oxygen participation of all melters. All melters shall be operated at the same oxygen participation level for the entire month. The permittee shall maintain records of the monthly oxygen participation level for the melters and make such records available to the Division upon request.

Oxygen Participation Level (%)	NO_X Emission Factor (lbs/MMscf)	Emission Factor Source
0	100	AP-42, Section 1.4 (dated 3/98), Table 1.4-1
5 to 15	230	Manufacturer
16 to 25	250	
26 to 50	350	
51 to 95	400	
100	50	

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.3 Emissions of CO and VOC **for all melters together** shall not exceed the limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342), as modified under the provisions of Section I, Condition 1.3 to reflect requested emissions on the APEN submitted July 27, 2006). Monthly emissions **from all melters together** shall be calculated by the end of the subsequent month, using the above emission factors (VOC emission factor based on performance test data, CO emission factor from AP-42, Section 1.4 (dated 3/98), Table 1.4-1) in the following equation:

For VOC, use equation in Condition 3.1.2.

For CO

$$\text{Tons/month} = \frac{\text{Natural Gas Consumption (MMscf/month) x EF (lb/MMscf)}}{\text{2000 lbs/ton}}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.4 The consumption of aluminum **for all melters (main hearths) together** shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342), as modified under the provisions of Section I, Condition 1.3 to reflect the requested production rate on the APEN submitted July 27, 2006). The aluminum consumption rates shall be measured and recorded each month. Monthly aluminum consumption rates shall be used in a rolling twelve month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.5 The consumption of natural gas **for all melters together** shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342), as modified under the provisions of Section I, Condition 1.3 to reflect the requested fuel consumption on the APEN submitted July 27, 2006). The natural gas consumption rate shall be determined using the fuel meters for the melters and recorded each month. Monthly natural gas consumption rates shall be used in a rolling twelve month total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.6 **For each melter:** Except as provided for in Condition 3.7, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permits 82WE250-3, 82WE250-4 and 84WE342) and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting visual observation of emissions

weekly. Such observations shall be made when the units are not operating during any of the specific activities specified in Condition 3.7. If any visible emissions are observed, the source shall investigate equipment performance and make any adjustments necessary. If, after maintenance has been performed, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

3.7 **For each melter:** No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4). If any of these operating conditions persists for one hour or more, a visual observation of emissions shall be performed. If any visible emissions are observed, the source shall investigate equipment performance and make any adjustments necessary. If, after maintenance has been performed, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

3.8 The requirements in 40 CFR Part 63, Subpart RRR as set forth in Condition 10 of this permit apply when coated charge is processed in the melter sidewells. Coated charge may be processed in any of the melter sidewells provided that the following requirements are met:

3.8.1 Coated charge is processed in only one melter sidewell at a time.

3.8.2 The requirements in 40 CFR Part 63 Subpart RRR are met and the sidewell is operated in compliance with the operating parameters (e.g. charge weight, baghouse inlet temperature, lime injection rate, reactive chlorine flux injection rate) established during the performance test for that sidewell.

3.8.3 The permittee retain records of the dates and quantities of coated material charged in each melter sidewell.

Coated charge may be processed in any two melter sidewells at the same time provided that a performance test is conducted within 90 days in accordance with the provisions in 40 CFR Part 63 Subpart RRR § 63.1511 (Conditions 10.24 through 10.28 of this permit) to determine compliance with the requirements in 40 CFR Part 63, Subpart RRR. Thereafter whenever coated charge is processed in any two melter sidewells at the same time, the following requirements shall be met:

3.8.4 The requirements in 40 CFR Part 63 Subpart RRR are met and the sidewells are operated in compliance with the operating parameters (e.g. charge weight, baghouse inlet temperature, lime injection rate, reactive chlorine flux injection rate) established during the performance test conducted for two sidewells operating concurrently.

3.8.5 The permittee retain records of the dates coated material is processed in two sidewells concurrently, the quantities of coated material charged and in which two melter sidewells coated material is charged.

4. S006 - Melt Area Baghouse (Melters #1, #2 and #3 Sidewells)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	4.1	**For each Melter:** 19.20 lb/hr	11.90 tons/yr	0.348 lbs/ton Al (shred and plant scrap only)	Recordkeeping and Calculation and Baghouse Maintenance	Monthly
PM_{10}		NA	11.90 tons/yr	0.348 lbs/ton Al (shred and plant scrap only)		See Conditions 4.1.3 and 4.1.4
Shredded and Plant Scrap Consumption	4.2	NA	68,166 tons/yr	NA	Recordkeeping	Monthly
Opacity	4.3	Except as provided for in Condition 4.4, below, not to exceed 20%		NA	Visible Emission Observations	Daily
	4.4	During certain operating conditions, not to exceed 30%				
CAM	4.5.	See Conditions 4.5, 11 and Appendix H				
MACT Requirements	4.6	**From Sidewells, When Processing Coated Charge:** 15 µg D/F TEQ per Mg of feed/charge		See Conditions 4.6 and 10.		
CAM	4.6	See Conditions 4.6, 11 and Appendix H				

4.1 Particulate Matter emissions are subject to the following limitations:

4.1.1 PM emissions **from each melter** shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.a). In the absence or

credible evidence to the contrary, compliance with the particulate matter standard is presumed provided that the requirements in Conditions 4.1.3 and 4.1.4 are met.

Note that the numeric PM standards were determined using the design rate for the melters (14.95 tons Al/hr per melter) in the following equation:

$PE = 3.59 \times (P)^{0.62}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

4.1.2 Emissions of PM and PM_{10} **from all melter sidewells combined** shall not exceed the limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 91WE864) as modified under the provisions of Section I, Condition 1.3). Monthly emissions from **all three melter sidewells together** shall be calculated by the end of the subsequent month, using the emission factors in the above table (from 10/29/02 synthetic minor (HAP) permit application – factors based on calculation) in the following equation:

$$\text{Tons/mo} = \frac{\text{Quantity of shredded/scrap material charged (tons/mo)} \times \text{EF (lbs/ton Al)}}{\text{2000 lbs/ton}}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

4.1.3 Routine maintenance of the baghouse shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

A visual emission observation of each stack shall be conducted daily. Should visible emissions, other than steam, be observed, the source shall follow the steps in 4.1.3.1 and 4.1.3.2 and record in a log the opacity observations and any action taken as a result of the observations.

The baghouse pressure drop shall be monitored and recorded daily. Should the daily recorded baghouse pressure drop be outside the manufacturer's recommendations, the source shall follow the steps in 4.1.3.1, 4.1.3.3, and 4.1.3.4, within one hour of the recorded pressure drop.

4.1.3.1 Verify that the process and control equipment are operating properly and perform any maintenance or adjustments needed to minimize visible emissions.

4.1.3.2 If, after maintenance and/or adjustments have been made, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the twenty percent (20%) opacity standard. Subject to the provisions of

C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

4.1.3.3 Perform any maintenance or adjustments needed on the baghouse.

4.1.3.4 If the baghouse pressure drop remains outside of manufacturer's specifications, the baghouse shall be inspected for bag integrity and overall mechanical efficiency. Necessary repairs shall be made prior to bringing the equipment back on line. Any action taken as a result of baghouse pressure drop shall be recorded in a daily log, for Division inspection upon request.

4.1.4 The baghouses shall be inspected for bag integrity and overall mechanical efficiency annually. Powdered dye tests shall be performed as necessary to identify faulty bags. Necessary repairs shall be made prior to bringing the equipment back on line. An adequate inventory of replacement bags and parts shall be maintained on site.

4.2 The consumption of shredded and plant scrap in **all three melter sidewells combined** shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 91WE864), as modified under the provisions of Section I, Condition 1.3). Consumption rates from **all three melter sidewells combined** shall be measured and recorded each month, and maintained for Division inspection upon request. Monthly consumption rates shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

4.3 Except as provided for in Condition 4.4, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (Construction Permit 91WE864, and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 4.1.3.

4.4 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty

consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 4.1.3.

4.5 This source is subject to the CAM requirements respect to the particulate matter limits (Condition 4.1) and the facility wide HAP limits (Condition 9) as set forth in Condition 11.

4.6 The requirements in 40 CFR Part 63, Subpart RRR as set forth in Condition 10 of this permit apply when coated charge is processed in the melter sidewells. Coated charge may be processed in any of the melter sidewells provided that the following requirements are met:

4.6.1 Coated charge is processed in only one melter sidewell at a time.

4.6.2 The requirements in 40 CFR Part 63 Subpart RRR are met and the sidewell is operated in compliance with the operating parameters (e.g. charge weight, baghouse inlet temperature, lime injection rate, reactive chlorine flux injection rate) established during the performance test for that sidewell.

4.6.3 The permittee shall retain records of the dates and quantities of coated material charged in each melter sidewell.

Coated charge may be processed in any two melter sidewells at the same time provided that a performance test is conducted within 90 days in accordance with the provisions in 40 CFR Part 63 Subpart RRR § 63.1511 (Conditions 10.24 through 10.28 of this permit) to determine compliance with the requirements in 40 CFR Part 63, Subpart RRR. Thereafter whenever coated charge is processed in any two melter sidewells at the same time, the following requirements shall be met:

4.6.4 The requirements in 40 CFR Part 63 Subpart RRR are met and the sidewells are operated in compliance with the operating parameters (e.g. charge weight, baghouse inlet temperature, lime injection rate, reactive chlorine flux injection rate) established during the performance test conducted for two sidewells operating concurrently.

4.6.5 The permittee retain records of the dates coated material is processed in two sidewells concurrently, the quantities of coated material charged and which two melter sidewells coated material is charged.

5. S008 - Hot Mill w/ Air Purifier

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
PM	5.1	18.03 lb/hr	3.9 tons/yr	0.0929 lb/ton Al pressed	Recordkeeping and Calculation and Purifier Maintenance	Monthly
PM_{10}		NA	3.9 tons/yr	0.0929 lb/ton Al pressed		See Condition 5.1.3
Aluminum Pressed	5.2	NA	84,722 tons/yr	NA	Recordkeeping	Monthly
Opacity	5.3	Except as provided for in Condition 5.4, below, not to exceed 20%		NA	Visible Emission Observations	Daily
	5.4	During certain operating conditions, not to exceed 30%				

5.1 Particulate Matter emissions are subject to the following limitations:

5.1.1 PM emissions shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.a). In the absence of credible evidence to the contrary, compliance with the short term PM limit is presumed provided that the requirements in Condition 5.1.3 are met.

Note that the numeric PM standards were determined using the design rate for the hot mill (13.5 tons Al/hr per melter) in the following equation:

$PE = 3.59 \times (P)^{0.62}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

5.1.2 PM and PM_{10} emissions shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-6), as modified under the provisions of Section I, Condition 1.3). Monthly emissions from the hot mill shall be calculated by the end of the subsequent month, using the emission factors in the above table (from 4/5/99 revised Title V permit application – based on stack test plus 20%) in the following equation:

$$\text{Tons/mo} = \frac{\text{Quantity of aluminum pressed (tons/mo) x EF (lbs/ton Al)}}{\text{2000 lbs/ton}}$$

Monthly emissions shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data..

5.1.3 Routine maintenance of the air purifier shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

A visual emission observation of each stack shall be conducted daily. Should visible emissions, other than steam, be observed, the source shall follow the steps in 5.1.3.1 and 5.1.3.2 and record in a log the opacity observations and any action taken as a result of the observations.

5.1.3.1 Verify that the process and control equipment are operating properly and perform any maintenance or adjustments needed to minimize visible emissions.

5.1.3.2 If, after maintenance and/or adjustments have been made, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the twenty percent (20%) opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

5.2 The amount of aluminum pressed shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-6). as modified under the provisions of Section I, Condition 1.3). Throughput rates shall be measured and recorded each month and maintained for Division inspection upon request. Monthly throughput rates shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

5.3 Except as provided for in Condition 5.4, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-6), and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 5.1.3.

5.4 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 5.1.3.

6. S009 - Two Annealing Furnaces

Parameter	Permit Condition Number	Limitations **(for both together)** Short Term	Limitations **(for both together)** Long Term	Compliance Emission Factor (lb/ton Al)	Limitations Short Term	Limitations Long Term
PM	6.1	**For each Furnace:** 34.5 lbs/hr	1.38 tons/yr	HM: 0.0455 Inter: 0.0205 Stab: 0.0224	Recordkeeping and Calculation	Monthly
PM_{10}		NA	1.38 tons/yr	HM: 0.0455 Inter: 0.0205 Stab: 0.0224		
NO_x		NA	4.22 tons/yr	HM: 0.0978 Inter: 0.0976 Stab: 0.0986		
CO		NA	3.54 tons/yr	HM: 0.0823 Inter: 0.0830 Stab: 0.0825		
VOC		NA	4.21 tons/yr	HM: 0.0055 Inter: 0.1537 Stab: 0.1786		
Aluminum Coil Throughput	6.2	NA	86,037 tons/yr	NA	Recordkeeping	Monthly
Fuel Use	6.3	NA	84.4 MMscf/yr	NA	Fuel Allocation (See Appendix G)	Monthly
Opacity	6.4	Except as provided for in Condition 6.5, below, not to exceed 20%		NA	Visual Observations	Weekly
	6.5	During certain operating conditions, not to exceed 30%				

6.1 Emissions of air pollutants **from both annealing furnaces together** are subject to the following requirements:

6.1.1 PM emissions **from each annealing furnace** shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.b). In the absence of credible evidence to the contrary, compliance with the particulate matter

standard **for each annealing furnace** is presumed based on maintaining a record of calculation demonstrating that with the combination of the emission factor and the quantity of aluminum charged to each furnace precludes noncompliance. A copy of the calculation shall be made available for Division review upon request.

Note that the numeric PM standards were determined using the design rate for the furnaces (75 tons Al/hr per furnace) in the following equation:

$PE = 17.31 \times (P)^{0.16}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

6.1.2 Emissions of air pollutants **from both annealing furnaces together** shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-8), as modified under the provisions of Section I, Condition 1.3). Monthly emissions shall be calculated by the end of the subsequent month using the emission factors in the above table (from 4/5/99 revised Title V permit application – based on calculation) the following equations:

For Hot Mill Annealing
Tons/month = Throughput (tons Al HM/month) x EF (lbs/ton Al) / 2000

For Intermediate Annealing
Tons/month = Throughput (tons Al Inter/month) x EF (lbs/ton Al) / 2000

For Stabilize Annealing
Tons/month = Throughput (tons Al Stab/month) x EF (lbs/ton Al) / 2000

For Fuel Use
Tons/month = Natural Gas Consumption (mmscf/month) x EF (lbs/mmscf) / 2000

Total emissions = Hot Mill + Intermediate + Stabilize + Fuel Use

Monthly emissions shall be used in a twelve-month rolling total to monitor compliance with the annual limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data. Records of calculations shall be maintained for Division inspection upon request.

6.2 The throughput of aluminum coil **for both annealing furnace together** shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-8), as modified under the provisions of Section I, Condition 1.3). Rates for each process (hot mill, intermediate and stabilize) shall be measured and recorded each month and maintained for Division inspection upon request. Rates for each process shall then be summed and the total monthly throughput rate shall be used in a twelve month rolling total to

monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

6.3 The consumption of natural gas **from both annealing furnaces together** shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-8), as modified under the provisions of Section I, Condition 1.3). Consumption rates shall be calculated by allocation as specified in Appendix G and recorded each month and maintained for Division inspection upon request. Monthly natural gas consumption shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

6.4 **For each furnace:** Except as provided for in Condition 6.5, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-8), and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting visual observation of emissions weekly. Such observations shall be made when the units are not operating during any of the specific activities specified in Condition 6.5. If any visible emissions are observed, the source shall investigate equipment performance and make any adjustments necessary. If, after maintenance has been performed, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

6.5 **For each furnace:** No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. If any of theses operating conditions persists for one hour or more, a visual observation of emissions shall be performed. If any visible emissions are observed, the source shall investigate equipment performance and make any adjustments necessary. If, after maintenance has been performed, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist

from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request. (Colorado Regulation No. 1, Section II.A.4)

7. S010 - Cold Mill w/ Air Purifier

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	7.1	30.6 lb/hr	9.15 tons/yr	Brkdown:0.0592 Inter: 0.1431 Finish: 0.2476	Recordkeeping and Calculation and Purifier Maintenance	Monthlyy See Condition 7.1.3
PM_{10}		NA	9.15 tons/yr	Brkdown:0.0592 Inter: 0.1431 Finish: 0.2476		
VOC		NA	67.38 tons/yr	Brkdown:0.4902 Inter: 1.212 Finish: 1.680		
Aluminum Sheet Processed	7.2	NA	124,000 tons/yr	NA	Recordkeeping	Monthly
Opacity	7.3	Except as provided for in Condition 7.4, below, not to exceed 20%		NA	Visible Emission Observations	Daily
	7.4	During certain operating conditions, not to exceed 30%				

7.1 Emissions of air pollutants are subject to the following requirements:

7.1.1 PM emissions shall not exceed the short term (lbs/hr) limitations stated above (Colorado Regulation No. 1, Section III.C.1.b). In the absence of credible evidence to the contrary, compliance with the short term PM limit is presumed provided that the requirements in Condition 7.1.3 are met.

Note that the numeric PM standards were determined using the design rate for the cold mill (35 tons Al/hr) in the following equation:

$PE = 17.31 \times (P)^{0.16}$ where: PE = particulate standard in lbs/hr
P = process weight rate in tons/hr

7.1.2 Emissions of air pollutants shall not exceed the annual limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-7), as modified under the provisions of Section I, Condition 1.3). Monthly emissions from the hot mill shall be calculated by the end of

the subsequent month, using the emission factors in the above table (per 4/5/99 revised Title V permit application - from stack tests) in the following equations:

Breakdown
Tons/month = Throughput (tons Al breakdown/month) x EF (lbs/ton Al) / 2000

Intermediate
Throughput (tons Al intermediate/month) x EF (lbs/ton Al) / 2000

Finish
Throughput (tons Al finish/month) x EF (lbs/ton Al) / 2000

Total emissions = Breakdown + Intermediate + Finish

Monthly emissions shall be used in a rolling twelve month total to monitor compliance with the annual limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data. Records of calculations shall be maintained for Division inspection upon request.

7.1.3 Routine maintenance of the air purifier shall be conducted in accordance with manufacturer's specifications and good engineering practices. These specifications shall be in written format, and shall be made available to the Division upon request.

A visual emission observation of each stack shall be conducted daily. Should visible emissions, other than steam, be observed, the source shall follow the steps in 7.1.3.1 and 7.1.3.2 and record in a log the opacity observations and any action taken as a result of the observations.

7.1.3.1 Verify that the process and control equipment are operating properly and perform any maintenance or adjustments needed to minimize visible emissions.

7.1.3.2 If, after maintenance and/or adjustments have been made, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the twenty percent (20%) opacity standard. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification. All observations shall be recorded and kept on site to be made available to the Division upon request.

7.2 The amount of aluminum sheet processed shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-7), as modified under the provisions of Section I, Condition 1.3). Production rates shall be measured and recorded each month and maintained for Division inspection upon request. Monthly material production rates shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

7.3 Except as provided for in Condition 7.4, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-7), and Colorado Regulation No. 1, Section II.A.1). Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 7.1.3.

7.4 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) Compliance with the opacity requirements shall be monitored by conducting daily visible emission observations in accordance with the requirements in Condition 7.1.3.

8. S011 - Coil Coating Line w/Thermal Oxidizer

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
PM	8.1	NA	0.86 tons/yr	7.6 lb/MMscf	Recordkeeping and Calculations	Monthly
PM_{10}		NA	0.86 tons/yr	7.6 lb/MMscf		
NO_x		NA	11.28 tons/yr	100 lb/MMscf		
CO		NA	9.47 tons/yr	84 lb/MMscf		
VOC		NA	14.00 tons/yr	Fuel Burning: 5.5 lb/MMscf Coatings/Solvents: Mass Balance		
Coating of Aluminum Sheet	8.2	NA	1,235,140.5 ft^2/yr	NA	Recordkeeping	Monthly
Natural Gas Consumption	8.3	NA	225 MMscf/yr	NA	Fuel Allocation (See Appendix G)	Monthly
Clean-up Solvent Consumption	8.4	NA	1495 gallons/yr	NA	Recordkeeping	Monthly
NSPS Requirements	8.5	VOC emissions not to exceed: 0.14 kg/l of coating solids **OR** 90% Reduction		NA	As required in Regulation No. 6, Part A, Subpart TT	
		Thermal Oxidizer effluent temperature not less than 1267 ° F for more than 3 consecutive hours				
		Reporting and Recordkeeping				
General Requirements	8.6	NA		NA	As required in Regulation No. 6, Part A, Subpart A	
Opacity	8.7	Except as provided for in Condition 8.8, below, not to exceed 20%		NA	Fuel Restriction	Only Natural Gas is Permitted to be Used as Fuel
	8.8	During certain operating conditions, not to exceed 30%				
Thermal Oxidizer Control Efficiency	8.9	99.0%		NA	See Condition 8.9	

8.1 Emissions of air pollutants shall not exceed the limitations stated above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-12)). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (AP-42, Section 1.4 (dated 3/98), Tables 1.4-1 and 1.4-2) in the following equations:

For PM, PM_{10}, NO_X ,CO and VOC emissions from natural gas consumption:

Tons/month = Nat. Gas Consumption (MMscf/month) x EF (lbs/MMscf) / 2000

For VOC emissions from coating/solvents used in the coating line (controlled by thermal oxidizer):

$$Tons/month = \{\sum_{i=1}^{n} [V_i D_i W_i]\} / 2000 * (1 - Eff)$$

Where:
- n = each coating/solvent
- V = volume of coating/solvent used per month (gal/month)
- D = density of coating/solvent (lbs/gal)
- W = VOC content of coating (lbs VOC/lbs coating), use 1.0 for solvents
- Eff = Reduction efficiency of control device

For VOC emissions from solvents used for clean-up (not controlled by thermal oxidizer

$$Tons/month = \{\sum_{i=1}^{n} [ViDi]\} / 2000$$

Total VOC Emissions = fuel combustion + coating line + clean-up – materials sent off-site or recycled

Monthly emissions shall be used in a twelve-month rolling total to monitor compliance with the annual limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data. Records of emission calculations shall be maintained for Division inspection upon request.

8.2 The coating of aluminum shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-12), as modified under the provisions of Section I, Condition 1.3). Throughput rates shall be measured and recorded each month and maintained for Division inspection upon request. Monthly throughput rates shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

8.3 The consumption of natural gas shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-12)). Natural gas consumption rates shall be calculated by allocation as specified in Appendix G and recorded each month and maintained for Division inspection upon request. Monthly natural gas consumption shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

8.4 The consumption of clean-up solvent shall not exceed the limitation above (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-

12)). Consumption rates shall be measured and recorded each month and maintained for Division inspection upon request. Monthly consumption rates shall be used in a twelve month rolling total to monitor compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

8.5 This unit is subject to 40 CFR 60, Subpart TT (as adopted by reference in Colorado Regulation No. 6, Part A, Subpart TT): Standards of Performance for Metal Coil Surface Coating Requirements as follows:

Standards for Volatile Organic Compounds (§ 60.462)

8.5.1 Each owner or operating subject to this subpart shall not cause to be discharged into the atmosphere more than:

8.5.1.1 0.14 kg VOC/ *l* of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency (§ 60.462(a)(2)); or

8.5.1.2 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency ((§ 60.462(a)(2)).

Performance Test and Compliance Provisions (§ 60.463)

8.5.2 Section 60.8(d) and (f) do not apply to the performance test. (§ 60.463(a))

8.5.3 The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section. (§ 60.463(b))

8.5.4 An owner or operator shall use the procedures in § 60.463(c)(2) for each affected facility that continuously uses a capture system and a control device that destroys VOCs (e.g., incinerator) to comply with the emission limits specified under § 60.462(a)(2) or (3) (Condition 8.5.1). (§ 60.463(c)(2))

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Division or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test. (§ 60.463(c)(2)(i)).

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as specified in § 60.463(c)(2)(ii)). ((§ 60.463(c)(2)(i)(C)).

Note that the initial performance test conducted in July 1996 indicated that the destruction efficiency of the thermal oxidizer was over 99.9%,

Monitoring of Emissions and Operations (§ 60.464)

8.5.5 If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ±2.5 °C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. ((§ 60.464(c))

Note that the temperature measured during the July 1996 performance test indicated a temperature of 1,317 º F, as a result temperature must remain above 1,267 º F.

8.5.6 The permittee is subject to the Reporting and Recordkeeping requirements found in § 60.465, except that retention of the records specified in § 60.465(e) shall be retained for the time period specified in Section IV, Condition 22.b and c.

8.5.7 The permittee is subject to the Test Method and Procedures requirements found in § 60.466.

8.6 This unit is subject to the requirements of 40 CFR 60, Subpart A, General Provisions (as adopted by reference in Colorado Regulation No. 6, Part A, Subpart A) including but not limited to the following:

8.6.1 Notification and Recordkeeping as required in § 60.7.

8.6.2 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution practice for minimizing emissions. (§ 60.11(d))

8.6.3 No article, machine, equipment or process shall be used to conceal an emissions which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§ 60.12)

8.7 Except as provided for in Condition 8.8, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standard are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)) in all subsections of Section II.A of Regulation No. l. (facility wide Colorado Construction Permit 03WE0032 (previously individual construction permit 82WE250-12), and Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for the thermal oxidizer.

8.8 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4) In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for the thermal oxidizer.

8.9 The VOC and HAP destruction efficiency of the thermal oxidizer shall be 99.0% or greater. A 99.0% control efficiency can be used in the emission calculations in Conditions 8.1 and 9 of this permit, provided that the thermal oxidizer is operated and maintained in accordance with the requirements in Condition 8.5.

9. Facility Wide HAP Emission Limits

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Each Individual HAP	9.1	NA	8 tons/year	See below	Recordkeeping and Calculation	Monthly
Total Facility Wide HAPs		NA	20 tons/year	See below		

9.1 Emissions of HAPs shall not exceed the limitations stated above (facility wide Colorado Construction Permit 03WE0032, as modified under the provisions of Section I, Condition 1.3 to set specific HAP limits of 8 tons/yr for any single HAP and 20 tons/yr of combined HAPS). HAP Emissions shall be calculated by the end of the subsequent month using actual throughputs and the following compliance emission factors.

Emission Source	Emission Factors	Source of Emission Factor
S001	0.0014 lb HAP metals/ton production	From 10/29/02 synthetic minor (HAP) permit application.
S002	0.002 lb HAP metals/ton production 0.02 lb HCl/ton production (assumes 97% reduction for lime injection baghouse)	From 10/31/03 renewal application – based on stack tests
S006	0.0009 lb HAP metals/ton production 0.0865 lb HCl/ton production 0.0083 lb HF/ton production	From 10/29/02 synthetic minor (HAP) permit application.
S011	HAP emissions shall be calculated as for VOC calculations as set forth in Condition 8.1.	Material Balance, 99 % control efficiency can be applied for the thermal oxidizer.
Fuel Use	1.80 lbs hexane/mmscf 0.075 lb formaldehyde/mmscf 0.0021 lb benzene/mmscf 0.0034 lb toluene/mmscf	AP-42, Section 1.4 (dated 3.98), Table 1.4-3

A twelve-month rolling total shall be used to monitor compliance with annual limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data. Records of calculations shall be maintained for Division inspection upon request. Control equipment shall be operated and maintained in accordance with the provisions set forth in the conditions for individual units, above.

10. National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production

This facility is subject to the provisions of 40 CFR Part 63, Subpart RRR, as follows. The requirements of this subpart pertaining to dioxin and furan (D/F) emissions and associated operating, monitoring, reporting and recordkeeping requirements apply to the affected sources listed in 63.1500(c), located at a secondary aluminum facility that is an area source of HAPs.

§ 63.1505 Emission standards for affected sources and emission units

10.1 *Scrap dryer/delacquering kiln/decoating kiln: alternative limits.* The owner or operator of a scrap dryer/delacquering kiln/decoating kiln may choose to comply with the emission limits in paragraph 63.1505(e) as an alternative to the limits in 63.1505(d) if the scrap dryer/delacquering kiln/decoating kiln is equipped with an afterburner having a design residence time of at least 1 second and the afterburner is operated at a temperature of at least 750ºC (1400ºF) at all times. On and after the compliance date, the owner or operator of a scrap dryer/delacquering kiln/decoating kiln must not discharge or cause to be discharged to the atmosphere emissions in excess of:

10.1.1 5.0 µg of D/F TEQ per Mg (7.0×10^{-5} gr of D/F TEQ per ton) of feed/charge from a scrap dryer/delacquering kiln/decoating kiln at a secondary aluminum production facility that is a major or area source. (63.1505(e)(1)(iii))

10.2 *Group 1 furnace.* The owner or operator of a group 1 furnace must use the limits in 63.1505(i) to determine the emission standards for a secondary aluminum processing unit (SAPU).

10.2.1 15 µg D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge. (63.1505(i)(3))

10.2.2 The owner or operator may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge. (63.1505(i)(6))

10.2.3 The owner or operator of a sidewell group 1 furnace that conducts reactive fluxing (except for cover flux) in the hearth, or that conducts reactive fluxing in the sidewell at times when the level of molten metal falls below the top of the passage between the sidewell and the hearth, must comply with the emission limit of paragraphs (i)(3) (Condition 10.2.1) of this section on the basis of the combined emissions from the sidewell and the hearth.

10.3 *Secondary aluminum processing unit*. On and after the compliance date, the owner or operator must comply with the emission limit calculated using the equation for D/F in 63.1505(k)(3) for each secondary aluminum production facility that is a major or area source. (63.1505(k))

The owner or operator of a SAPU at a secondary aluminum production facility that is an area source may demonstrate compliance with the emission limits of 63.1505(k)(3) by demonstrating that each emission unit within the SAPU is in compliance with the emission limit of 63.1505(i)(3) (Condition 10.2.1). (63.1505(k)(5))

§ 63.1506 Operating Requirements

Summary. On and after the compliance date, the owner or operator must operate all new and existing affected sources and control equipment according to the requirements of 63.1506. (63.1506(a)(1))

10.4 *Labeling*. The owner or operator must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

10.4.1 The type of affected source of emission unit. (63.1506(b)(1))

10.4.2 The applicable operational standard(s) and control method(s) (work practice of control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated into the OM&M plan. (63.1506(b)(2))

10.4.3 The afterburner operating temperature and design residence time for a scrap dryer/delacquering kiln/decoating kiln. (63.1506(b)(3))

10.5 *Capture/collection systems*. For each affected source or emission unit equipped with an add-on air pollution control device, the owner or operator must:

10.5.1 Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of “Industrial Ventilation: A Manual if Recommended Practice.” (63.1506(c)(1))

10.5.2 Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter. (63.1506(c)(2))

10.5.3 Operate each capture/collection system according to the procedures and requirements in the OM&M plan. (63.1506(c)(3))

10.6 *Feed/charge weight*. The owner or operator of each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) of feed charge must:

10.6.1 Except as provided in 63.1506(d)(3) (Condition 10.6.3, below) install and operate a device that measures and records or otherwise determine the weight of feed/charge

(or throughput) for each operating cycle or time period used in the performance test. (63.1506(d)(1))

10.6.2 Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan. (63.1506(d)(2))

10.6.3 The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit provided that: (i) the aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and (ii) all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight. (63.1506(d)(3))

10.7 *Scrap dryer/delacquering kiln/decoating kiln*. The owner or operator of a scrap dryer/delacquering kiln/decoating kiln with emissions controlled by an afterburner and a lime-injected fabric filter must:

10.7.1 For each afterburner (63.1506(g)(1)).

10.7.1.1 Maintain the 3-hour block average operating temperature of each afterburner at or above the average temperature established during the performance test. (63.1506(g)(1)(i))

10.7.1.2 Operate each afterburner in accordance with the OM&M plan. (63.1506(g)(1)(ii))

10.7.2 If a bag leak detection system is used to meet the fabric filter monitoring requirements in §63.1510 (63.1506(g)(2)).

10.7.2.1 Initiate corrective action within 1-hour of a bag leak detection system alarm and complete any necessary corrective action procedures in accordance with the OM&M plan. (63.1506(g)(2)(i))

10.7.2.2 Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action. (63.1506(g)(2)(ii))

10.7.3 Maintain the 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 14 °C (plus 25 °F). (63.1506(g)(3))

10.7.4 For a continuous injection device, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at the same level established during the performance test. (63.1506(g)(5))

10.8 *Group 1 furnace with add-on air pollution control devices*. The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:

10.8.1 If a bag leak detection system is used to meet the monitoring requirements in §63.1510, the owner or operator must: (63.1506(m)(1))

10.8.1.1 Initiate corrective action within 1 hour of a bag leak detection system alarm. (63.1506(m)(1)(i))

10.8.1.2 Complete the corrective action procedures in accordance with the OM&M plan. (63.1506(m)(1)(ii))

10.8.1.3 Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action. (63.1506(m)(1)(iii))

10.8.2 Maintain the 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 14 °C (plus 25 °F). (63.1506(m)(3))

10.8.3 For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at the same level established during the performance test. (63.1506(m)(4))

10.8.4 Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test. (63.1506(m)(5))

10.8.5 Operate each sidewell furnace such that: (63.1506(m)(6))

10.8.5.1 The level of molten metal remains above the top of the passage between the sidewell and hearth during reactive flux injection, unless emissions from both the sidewell and the hearth are included in demonstrating compliance with all applicable emission limits. (63.1506(m)(6)(i))

10.8.5.2 Reactive flux is added only in the sidewell, unless emissions from both the sidewell and the hearth are included in demonstrating compliance with all

applicable emission limits. (63.1506(m)(6)(ii))

10.9 *Corrective action*. When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation. (63.1506(p))

§ 63.1510 Monitoring Requirements

Summary. On and after the compliance date, the owner or operator of a new or existing affected source or emission unit must monitor all control equipment and processes according to the requirements in 63.1510. (63.1510(a))

10.10 *Operation, maintenance, and monitoring (OM&M) plan*. The owner or operator must prepare and implement for each new or existing affected source and emission unit, a written OM&M plan. The owner or operator of an existing affected source must submit the plan to the Division no later than the compliance date. Each plan must contain the information as set forth in 63.1510(b).

10.11 *Labeling*. The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 63.2506(b) are intact and legible. (63.1510(c))

10.12 *Capture/collection system*. The owner or operator must:

10.12.1 Install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device. (63.1510(d)(1))

10.12.2 Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 63.1506(c) and record results of each inspection. (63.1510(d)(2))

10.13 *Feed/charge weight*. The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test, as set forth in 63.1510(e). Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit

basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the Division to determine the total weight of feed/charge or aluminum production to the affected source or emission unit. (63.1510(e))

10.14 *Fabric filters and lime-injected fabric filters.* The owner or operator of an affected source or emission unit using a fabric filter or lime-injected fabric filter to comply with the requirements of this subpart must install, calibrate, maintain, and continuously operate a bag leak detection system as required in paragraph (f)(1) of this section.

10.14.1 These requirements apply to the owner or operator of a new or existing affected source or existing emission unit using a bag leak detection system. (63.1506(f)(1))

10.14.1.1 The owner or operator must install and operate a bag leak detection system for each exhaust stack of a fabric filter. (63.1506(f)(1)(i))

10.14.1.2 Each triboelectric bag leak detection system must be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD–19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other bag leak detection systems must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations. (63.1506(f)(1)(ii))

10.14.1.3 The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less. (63.1506(f)(1)(iii))

10.14.1.4 The bag leak detection system sensor must provide output of relative or absolute PM loadings. (63.1506(f)(1)(iv))

10.14.1.5 The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor. (63.1506(f)(1)(v))

10.14.1.6 The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel. (63.1506(f)(1)(vi))

10.14.1.7 For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be

installed downstream of the fabric filter. (63.1506(f)(1)(vii))

10.14.1.8 Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors. (63.1506(f)(1)(viii))

10.14.1.9 The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time. (63.1506(f)(1)(ix))

10.14.1.10 Following initial adjustment of the system, the owner or operator must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition. (63.1506(f)(1)(x))

10.15 *Afterburner*. These requirements apply to the owner or operator of an affected source using an afterburner to comply with the requirements of Subpart RRR.

10.15.1 The owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR Part 63, Subpart A. (63.1510(g)(1))

10.15.2 The temperature monitoring device must meet each of the performance and equipment specifications set forth in 63.1510(g)(2).

10.15.3 The owner or operator must conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection must include the items set forth in 63.1510(g)(3).

10.16 *Fabric filter inlet temperature.* These requirements apply to the owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter to comply with the requirements of this subpart.

10.16.1 The owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in subpart A of this part. (63.1510(h)(1))

10.16.2 The temperature monitoring device must meet each of these performance and equipment specifications:

10.16.2.1 The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period. (63.1510(h)(2)(i))

10.16.2.2 The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in § 63.1512(n). (63.1510(h)(2)(ii))

10.16.2.3 The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator. (63.1510(h)(2)(iii))

10.17 *Lime injection.* These requirements apply to the owner or operator of an affected source or emission unit using a lime-injected fabric filter to comply with the requirements of this subpart.

10.17.1 The owner or operator of a continuous lime injection system must verify that lime is always free-flowing by inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period. (63.1506(i)(1)(i))

10.17.2 The owner or operator of a continuous lime injection system must record the lime feeder setting once each day of operation. (63.1506(i)(2))

10.17.3 An owner or operator who intermittently adds lime to a lime coated fabric filter must obtain approval from the permitting authority for a lime addition monitoring procedure. The permitting authority will not approve a monitoring procedure unless data and information are submitted establishing that the procedure is adequate to ensure that relevant emission standards will be met on a continuous basis. (63.1506(i)(3))

10.18 *Total reactive flux injection rate.* These requirements apply to the owner or operator of a group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer. The owner or operator must:

10.18.1 Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit. (63.1510(j)(1))

10.18.1.1 The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. (63.1510(j)(1)(i))

10.18.1.2 The accuracy of the weight measurement device must be ±1 percent of the weight of the reactive component of the flux being measured. The owner

or operator may apply to the permitting authority for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of ±1 percent impracticable. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards. (63.1510(j)(1)(ii))

10.18.1.3 The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months. (63.1510(j)(1)(iii))

10.18.2 Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in § 63.1512(o). (63.1510(j)(2))

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

10.18.3.1 Gaseous or liquid reactive flux other than chlorine; and

10.18.3.2 Solid reactive flux. (63.1510(j)(3))

10.18.4 Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in § 63.1512(o). (63.1510(j)(4))

10.18.5 The owner or operator of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis. (63.1510(j)(5))

10.19 *Sidewell group 1 furnace with add-on air pollution control devices*. These requirements apply to the owner or operator of a sidewell group 1 furnace using add-on air pollution control devices. The owner or operator must:

10.19.1 Record in an operating log for each charge of a sidewell furnace that the level of molten metal was above the top of the passage between the sidewell and hearth during reactive flux injection, unless the furnace hearth was also equipped with an add-on control device. (63.1510(n)(1))

10.19.2 Submit a certification of compliance with the operational standards in 63.1506(m)(7) for each 6-month reporting period. Each certification must contain the information in 63.1516(b)(2)(iii). (63.1510(n)(2))

10.20 *Site-specific requirements for secondary aluminum processing units*.

10.20.1 The owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 63.1510(b), the information set forth in 63.1510(s)(1).

10.20.2 The SAPU compliance procedures within the OM&M plan may not contain any of the provisions set forth in 63.1510(s)(2).

10.20.3 To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the Division containing the information required by 63.1510(s)(1) and obtain approval of the Division prior to implementing any revisions. (63.1510(s)(3))

10.21 *Secondary aluminum processing unit compliance by individual emission unit demonstration*. As an alternative to the procedure of 63.1510(t), an owner or operator may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit. (63.1510(u))

10.22 *Alternative monitoring method for lime addition.* The owner or operator of a lime-coated fabric filter that employs intermittent or noncontinuous lime addition may apply to the Administrator for approval of an alternative method for monitoring the lime addition in accordance with the provisions of 63.1510(v).

10.23 *Alternative monitoring methods*. An owner or operator may submit an application to the Division for approval of alternative monitoring requirements to demonstrate compliance with emission standards of Subpart RRR, subject to the provisions of 63.1510(w).

§ 63.1511 Performance test/compliance demonstration general requirements.

10.24 *Site-specific test plan*. Prior to conducting a performance test required by Subpart RRR, the owner or operator must prepare and submit a site-specific test plan which satisfies all of the requirements, and must obtain approval of the plan pursuant to the procedures set forth in 63.7(c). (63.1511(a))

10.25 *Initial Performance test*: Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance in accordance with the provisions in 63.1511(b).

10.26 *Test methods.* The owner or operator must use the methods set forth in 63.1511(c) to determine compliance with the applicable emission limits or standards.

10.27 *Alternative methods.* The owner or operator may use an alternative test method, subject to approval by the Division. (63.1511(d))

10.28 *Establishment of monitoring and operating parameter values.* The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 63.1510 that ensures compliance with the applicable emission limit or standard, in accordance with 63.1511(g).

§ 63.1512 Performance test/compliance demonstration requirements and procedures.

10.29 *Scrap dryer/delacquering kiln/decoating kiln.* The owner or operator must conduct performance tests to measure emissions of D/F at the outlet of the control device as set forth in 63.1512(c).

10.30 *Group 1 furnace with add-on air pollution control devices.* The owner or operator must conduct performance tests to measure emissions of D/F at the outlet of the control device as set forth in 63.1512(d).

10.31 *Feed/charge weight measurements.* During emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test rounds and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight. (63.1512(k))

10.32 *Afterburner.* The owner or operator of an affected source using an afterburner must comply with the requirements of 63.1512(m).

10.33 *Inlet gas temperature.* The owner or operator of a scrap dyer/delacquering kiln/decorating kiln or a group 1 furnace using a lime-injected fabric filter must use the procedures in 63.1512(n) to establish an operating parameter value or range for the inlet gas temperature.

10.34 *Flux injection rate.* The owner or operator must use the procedures in 63.1512(o) to establish an operating parameter value or range of the total reactive chlorine flux injection rate.

10.35 *Lime injection rate.* The owner or operator of an affected source or emission unit using a lime-injected fabric filter system must use the procedures in 63.1512(p) during the D/F test to establish an operating parameter value for the feeder setting for each operating cycle of time period used in the performance test.

10.36 *Bag leak detection system.* The owner or operator of an affected source or emission unit using a bag leak detection system must submit the information described in §63.1515(b)(6) as part of the

notification of compliance status report to document conformance with the specifications and requirements in §63.1510(f). (63.1512(q))

10.37 *Labeling.* The owner or operator of each scrap dryer/delacquering kiln/decorating kiln, group 1 furnace, group 2 furnace and in-line fluxer must submit the information described in 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 63.1506(b). (63.1512(r))

10.38 *Capture/collection system.* The owner or operator of a new or existing affected source or emission unit with an add-on control device must submit the information described in 63.1515(b)(2) as part of the notification of compliance status report to document conformance with the operational standard in 63.1506(c). (63.1512(s))

§ 63.1513 Equations for determining compliance.

10.39 The owner or operator shall use the equations set forth in 63.1513 to determine compliance with emission limits.

§ 63.1515 Notifications.

10.40 *Initial notifications.* The owner or operator must submit initial notifications to the Division as described in 63.1515(a).

10.41 *Notification of compliance status report.* Each owner or operator of an existing affected source must submit a notification of compliance status report within 60 days after the compliance date specified in 63.1501 (Condition 10.1, above). The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in 63.1515(b). The report may be submitted as set forth in 63.1515(b).

§ 63.1516 Reports.

10.42 *Startup, shutdown, and malfunction plan/reports.* The owner or operator must develop a written plan as described in 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program for corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 63.10(b) and record and report if an action taken during startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 63.6(e)(3). In addition to the information required in 63.6(e)(3), the plan must include the items set forth in 63.1516(a). (63.1516(a))

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

the owner or operator must submit a report stating that no excess emissions occurred during the reporting period. (63.1516(b))

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

10.43.2 Each report must include each of the certifications listed in 63.1516(b)(2), as applicable.

10.43.3 The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested. (63.1516(b)(3))

10.44 *Annual compliance certifications.* For the purpose of annual certifications of compliance required by 40 CFR Part 70, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions: (1) Any period of excess emissions, as defined in 63.1516(b)(1), that occurred during the year were reported as required by Subpart RRR; and (2) All monitoring, recordkeeping, and reporting requirements were met during the year. (63.1516(c))

§ 63.1517 Records

10.45 As required by 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions (Subpart A) and Subpart RRR. (63.1517(a)) Records shall be maintained as set forth in 63.1517(a)(1) through (3).

10.46 In addition to the general records required by 63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must retain records of the information listed in 63.1517(b).

§ 63.1516 Applicability of General Provisions

10.47 The requirements of the general provisions in Subpart A of this part that are applicable to the owner or operator subject to the requirements of this subpart are shown in Appendix A of this subpart. The general provisions that apply to this source, include but are not limited to the following:

10.47.1 Prohibited activities in 63.4.

10.47.2 Operation and maintenance requirements in 63.6(e)(1).

10.47.3 Startup, shutdown and malfunction plan requirements in 63.6(e)(3).

10.47.4 Performance test requirements in 63.7.

10.47.5 Monitoring requirements in 63.8.

10.47.6 Notification requirements in 63.9.

10.47.7 Recordkeeping requirements in 63.10.

11. Compliance Assurance Monitoring

11.1 The Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, apply to S002 – Delacquering Kiln with respect to the facility wide HAP emission limitations identified in Condition 9 and S006 – Melt Area Baghouse with respect to the particulate matter and facility wide HAP limitations identified in Conditions 4.1 and 9 as follows:

11.1.1 The permittee shall follow the CAM Plan provided in Appendix H of this permit. Excursions, for purposes of reporting, are as follows:

11.1.1.1 For S006 (Melt Area Baghouse) Any instance in which the bag leak detection system alarms.

11.1.1.2 For S006 (Melt Area Baghouse) Any day in which the bag leak deteciont system is not operational for any time during that day.

11.1.1.3 For S002 (Delaquering Kiln) and S006 (Melt Area Baghouse) Any day in which the recorded lime injection rate is not at the level set during the relevant performance test.

11.1.1.4 For S002 (Delaquering Kiln) and S006 (Melt Area Baghouse) Any day in the daily check reveals that lime is not free-flowing.

11.1.1.5 For S002 (Delaquering Kiln) and S006 (Melt Area Baghouse) Any day in which the daily check for free-flowing lime and lime injection rate is not conducted. Note that daily checks are not required on days when the delaquering kiln and/or melter sidewells are not in operation for any time during that day.

Excursions of these limitations shall be reported as required by Section IV, Conditions 21 and 22.d of this permit.

11.1.2 Operation of Approved Monitoring

11.1.2.1 At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (40 CFR Part 64 § 64.7(b), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.2.2 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable,

calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions (40 CFR Part 64 § 64.7(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.2.3 Response to excursions or exceedances

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable (40 CFR Part 64 § 64.7(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process (40 CFR Part 64 § 64.7(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.2.4 After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Division and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR Part 64 § 64.7(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3 Quality Improvement Plan (QIP) Requirements

11.1.3.1 Based on the results of a determination made under the provisions of Condition 11.1.2.3.b, the Division may require the owner or operator to develop and implement a QIP (40 CFR Part 64 § 64.8(a), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3.2 The owner or operator shall maintain a written QIP, if required, and have it available for inspection (40 CFR Part 64 § 64.8(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3.3 The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

a. Improved preventative maintenance practices (40 CFR Part 64 § 64.8(b)(2)(i), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Process operation changes (40 CFR Part 64 § 64.8(b)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Appropriate improvements to control methods (40 CFR Part 64 § 64.8(b)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

d. Other steps appropriate to correct control performance (40 CFR Part 64 § 64.8(b)(2)(iv), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

e. More frequent or improved monitoring (only in conjunction with one or more steps under Conditions 11.1.3.3.a through d above) (40 CFR Part 64 § 64.8(b)(2)(v), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3.4 If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined (40 CFR Part 64 § 64.8(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3.5 Following implementation of a QIP, upon any subsequent determination pursuant to Condition 11.1.2.3.b, the Division or the U.S. EPA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems (40 CFR Part 64 § 64.8(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions (40 CFR Part 64 § 64.8(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.3.6 Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act (40 CFR Part 64 § 64.8(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.1.1 Reporting and Recordkeeping Requirements

11.1.3.7 In addition to the reporting requirements in Section IV, Conditions 21 and 22.d and the recordkeeping requirements in Section IV, Condition 22.a through c, the following apply:

a. The owner or operator shall submit, if necessary, a description of the actions taken to implement a QIP during the reporting period as specified in Condition 11.1.3 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring (40 CFR Part 64 §

64.9(a)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. The owner or operator shall maintain records of any written QIP required pursuant to Condition 11.1.3 and any activities undertaken to implement a QIP, and any supporting information required to be maintained under these CAM requirements (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions) (40 CFR Part 64 § 64.9(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements (40 CFR Part 64 § 64.9(b)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.4 Savings Provisions

11.1.4.1 Nothing in these CAM requirements shall excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act. These CAM requirements shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purposes of determining the monitoring to be imposed under separate authority under the federal clean air act, including monitoring in permits issued pursuant to title I of the federal clean air act. The purpose of the CAM requirements is to require, as part of the issuance of this Title V operating permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of CAM (40 CFR Part 64 § 64.10(a)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.4.2 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to impose additional or more stringent monitoring, recordkeeping, testing or reporting requirements on any owner or operator of a source under any provision of the federal clean air act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

11.1.4.3 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to take any enforcement action under the federal clean air act for any violation of an applicable requirement or of any person to take action under section 304 of the federal clean air act (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B and § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

No requirements were specifically requested to be included in the permit shield for this facility.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition	Streamlined (Subsumed) Requirements
Section I, Conditions 1.1.1, 2.1.1, 3.1.1 and 4.1.1	Regulation No. 6, Part B, Section III..C.1 [particulate matter standard - $E = 3.59(P)^{0.62}$] **– State-only provision.**
Section I, Conditions 6.1.1 and 7.1.1	Regulation No. 6, Part B, Section III..C.2 [particulate matter standard - $E = 17.31(P)^{0.16}$] **– State-only provision.**

SECTION IV - General Permit Conditions

11/16/10 version

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&e. and V.C.17.

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.

c. Compliance certifications shall contain:

(i) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II,.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

(i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

(ii) approves the use of an equivalent method;

(iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

(iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

(i) Sampling ports adequate for test methods applicable to such facility;

(ii) Safe sampling platform(s);

(iii) Safe access to sampling platform(s); and

(iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other

circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

(i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;

(ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;

(iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;

(iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

(v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;

(viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

(ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and

(x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

(i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

(ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

(iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

(v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator’s actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., and § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule for 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.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Controls for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "asbestos control."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S. §§ 25-7-114.1(6) and 25-7-114.7

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

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

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

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

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit . The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

(ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

(iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(i) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines 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; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

   Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

A - INSPECTION INFORMATION
B – MONITORING AND PERMIT DEVIATION REPORT
C - COMPLIANCE CERTIFICATION REPORT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS
G - FUEL ALLOCATION
H – COMPLIANCE ASSURANCE MONITORING PLAN

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in this permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant:

The facility is located one half mile east of highway 85 on 14th street.

Safety Equipment Required:

Eye Protection, Safety Shoes, Hearing Protection, Gloves and Tap Coats (Tap Coats will be furnished by Golden Aluminum).

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on April 5, 1999 with the source's Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

Tab wash line, wash and rinse tank, burners 1-5, tension level, paint storage room, stamco and braner slitter, roll shop, truck shop, Maintenance shop, electrical shop, block shop, emergency generator room, cooling tower, UCB storage building, chemical storage pad, pallet storage building, waste water pretreatment, air handling units, space heater exhaust, air intake stacks, water vent, cooling tower vent, steam vent washer, burner exhaust, rinse tank, steam vent rinse tank, steamvent, air vent restrooms, burner exhaust predryer, burner exhaust washer, coating room vent, annealing furnace exhaust, QA/QC lab vents, water exhaust out, ventilation fan radiant heater, west and east QA/QC lab, coating line satellite lab, melt house lab, coil coating material, lubricating material, coolants (cold and hot mill), future building expansion, (9) 150,000 btu space heaters, , sodium hydroxide totes, potassium hydroxide totes, phosphoric acid totes, sulfuric acid totes, chromium conversion coating totes, 55 gallon drums and totes, welding and soldering operations, striping the parking lot as needed, various labs and offices, furnace rebuilds, delaquering kiln rebuild, thermal oxidizer rebuilds, various lawn mowers and weed eaters, weeding activities, sweeping parking lot, landscaping and pest control activities, trash bins, thermite fires, baghouse fires, grass and weed fires, truck wash unit, (4) copying machines, PC printers, daily janitorial services, (8) 50 lb propane tanks, (2) 1,000 gallon diesel fuel tanks, (2) 12,000 gallon coolant tanks, hot mill Hoffman filter exhaust, (2) 1,078 and 4,800 gallon waste coolant tanks, (1) 297 gallon gasoline tank, (1) 2,674 gallon Morgoil tank, (2) 900K btu heating units, (3) 600K btu heating units, 14 forklifts, 3 frontloaders, emergency power generator, front office lighting.

APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance 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.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits.
All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of

such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "malfunction" shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the

permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

Startup, Shutdown, Malfunctions and Emergencies

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Golden Aluminum, Inc.
OPERATING PERMIT NO: 96OPWE125
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code[2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
S001	Three Modified Miller Shedders and Particle Separator Drop Box, Design Rated at 3 TPH each, Baghouse Controlled.					
S002	Custom Apros Delaquering Kiln, 14 MMBtu Natural Gas Fired Burner, Design Rated at 10 TPH, SN: BIN221Controlled by a Thermal Oxidizer and baghouse.					
S003	Custom Melter # 1 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.					
S004	Custom Melter # 2 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.					
S005	Gillespie/Powers Melter # 3 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH, SN: 0286.					
S006	Melt Area Baghouse for Sidewell Melting, Degassing and Filtration, Design Rated at 15 TPH.					
S008	Hot Mill, Design Rated at 13.5 TPH, Controlled with an Air Purifier Centrifugal Separator.					

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code[2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
S009	Two Custom Secowarwick Annealing Furnaces, Two U-Tube 17.5 MMBtu Natural Gas Fired Burners, Design Rated at 78 TPH each.					
S010	Davy-McKee Cold Rolling Mill 2-STD, Design Rated at 35 TPH, Controlled with a Air Purifier Centrifugal Separator.					
S011	Custom Hunter Coil Coating, 26.1 MMBtu Grace Tec Natural Gas Fired Burner, Controlled with an incinerator.					
	General Conditions					
	Insignificant Activities					

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2]Use the following entries as appropriate:

1 = Standard: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed
6 = Record: When the requirement is recordkeeping
7 = Report: When the requirement is reporting
8 = CAM: A situation in which an excursion or exceedance as defined in 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other: When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Golden Aluminum, Inc.
OPERATING PERMIT NO: 96OPWE125
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction_____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction __XX____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to A. Einstein, APCD

Deviation Code _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Golden Aluminum, Inc.

FACILITY IDENTIFICATION NUMBER: 1230089

PERMIT NUMBER: 96OPWE125

REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name Title

Signature of Responsible Official Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C

Required Format for Annual Compliance Certification Reports

ver 2/20/07

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Golden Aluminum, Inc.

OPERATING PERMIT NO: 96OPWE125
REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was Compliance Continuous or Intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
S001	Three Modified Miller Shedders and Particle Separator Drop Box, Design Rated at 3 TPH each, Baghouse Controlled.						
S002	Custom Apros Delaquering Kiln, 14 MMBtu Natural Gas Fired Burner, Design Rated at 10 TPH, SN: BIN221Controlled by a Thermal Oxidizer and baghouse.						

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was Compliance Continuous or Intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
S003	Custom Melter # 1 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.						
S004	Custom Melter # 2 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH.						
S005	Gillespie/Powers Melter # 3 Pool, 32 MMBtu air/oxy/fuel Pyretron NF 2500 Burner (Natural Gas-Fired), Design Rated at 14.95 TPH, SN: 0286.						
S006	Melt Area Baghouse for Sidewell Melting, Degassing and Filtration, Design Rated at 15 TPH.						
S008	Hot Mill, Design Rated at 13.5 TPH, Controlled with an Air Purifier Centrifugal Separator.						
S009	Two Custom Secowarwick Annealing Furnaces, Two U-Tube 17.5 MMBtu Natural Gas Fired Burners, Design Rated at 78 TPH each.						
S010	Davy-McKee Cold Rolling Mill 2-STD, Design Rated at 35 TPH, Controlled with a Air Purifier Centrifugal Separator.						
S011	Custom Hunter Coil Coating, 26.1 MMBtu Grace Tec Natural Gas Fired Burner, Controlled with an incinerator.						
	General Conditions						
	Insignificant Activities [4]						

[1] If deviations were noted in a previous deviation report , put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

[2] Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

[3] Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

[4] Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

_____

Printed or Typed Name Title

_____

Signature Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

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APPENDIX D

Notification Addresses

1. Air Pollution Control Division

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Jim King

2. United States Environmental Protection Agency

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
D/F -	Dioxin/Furan
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HCl -	Hydrogen Chloride
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
KG -	Kilogram
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
Mg -	Megagram
µg	microgram
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants

NSPS -	New Source Performance Standards
OM&M -	Operating, Maintenance and Monitoring (Plan)
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM10 -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SAPU -	Secondary Aluminum Processing Unit
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide\
TEQ -	Toxicity Equivalent
THC -	Total Hydrocarbon
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
January 11, 2011	Minor Modification	Section I	Revised the table to indicate that the shredders are equipped with a particle separator drop box, rather than a cyclone.
		Section II.1	Revised the summary table header to indicate that the shredders are equipped with a particle separator drop box, rather than a cyclone. Removed the phrase "Filter Media Roll and" in Condition 1.1 of the summary table. Replaced the references to "filter media roll" in Conditions 1.1.3, 1.1.3.3 and 1.1.3.4 with "baghouse". Revised the language in Condition 1.1.4 to address annual internal baghouse inspections (this condition now has the same language as found in Section II, Condition 2.1.5).
		Section IV	Changed the version date. Condition 29 (VOC) was revised primarily to add the provisions in Reg 7, Section III.C as paragraph e although other minor language and format changes were made.
		Appendices B and C	Revised the tables to indicate that the shredders are equipped with a particle separator drop box rather than a cyclone.

APPENDIX G

Fuel Allocation

*The methods outlined will be used to calculate fuel use for Units S002, S009 and S011

A) FUEL ALLOCATION TO INDIVIDUAL UNITS

For Each Piece of Equipment, Fuel Use =

$$\frac{\text{[Fuel Design Rate][Hrs. of Operation] X [Facility Fuel Use for Month – Fuel Use for Units S003 + S004 + S005]}}{\text{[Sum of Numerator for Each Piece of Equipment]}}$$

Unit Number	Fuel Design Rate
S002	14.0 MMBtu/hr
S009	17.5 MMBtu/hr
S011	26.1 MMBtu/hr

*Allocated Fuel Use shall be determined within the first seven days of each month based on the monthly hours of operation for each listed piece of equipment from the previous month.

APPENDIX H

Compliance Assurance Monitoring Plan

I. Background

a. Emission Unit Description:

S002 – Delacquering Kiln – The kiln burns the coating off of shredded aluminum scrap. A lime-injected baghouse controls HAP emissions.

S006 – Hot Melt Area Baghouse – This baghouse controls PM. PM_{10}, and HAP emissions from the sidewells from Melters #1, #2 and #3 and the degassing and filtration units.

b. Applicable Regulations, Emission Limits, Monitoring Requirements

Parameter	Permit Condition Number	Emission Limitations	Monitoring Requirements
PM (S006)	4.1.1	19.20 lbs/hour 11.90 tons/year	bag leak detection system
PM_{10} (S006)	4.1.1	11.90 tons/year	bag leak detection system
HAPs	9	8 tons/year any single HAP 30 tons/year combined HAPs	Lime injection rate

c. Control Technology

S002 – Delacquering Kiln: Lime Injected Baghouse
S006 – Melt Area Baghouse (Sidewells of Melters #1, #2 and #3): Lime Injected Baghouse

II. Monitoring Approach

	Indicator (S006 Only)	Indicator (Both S002 and S006)
I. Indicator	Bag Leak Detection System	Lime Injection Rate
Measurement Approach	A Triboguard © particulate monitor continuously detects and measures releases of particulate matter in the discharge air system.	Lime addition is regulated by a variable frequency drive to maintain constant lime feed into the exhaust stream for HCl control. Lime addition rate is set by a controller to correspond to the type of scrap being processed. Rate of feed is set by verifying lime flow to motor drive speed. On a daily basis, the permittee shall verify that lime is free-flowing daily and record the lime injection rate.
II. Indicator Range	An excursion is defined as any instance in which the bag leak detection system alarm sounds. An excursion is also defined as any day in which the bag leak detection system is not operational for any part of that day. In addition to the above, when an excursion occurs, personnel will investigate to determine why baghouse and/or bag leak detection system performance is compromised and make any necessary adjustments. The Work Order system log will be updated with repairs or adjustments made, the craftsman(s) involved, date and time.	An excursion is defined as any day in which the recorded lime injection rate is not at the level set during the performance test. An excursion is also defined as any day on which the daily check reveals that lime is not free-flowing. An excursion is also defined as any day on which the daily checks have not been conducted. Daily checks are not required on days when the delaquering kiln and/or melter sidewells are not in operation for any time during that day. Excursions require the source to conduct corrective action. The Work Order system log will be updated with repairs or adjustments made, the craftsman(s) involved, date and time.
II. Performance Criteria		
a. Data Representativeness	The bag leak detection system indicates bag condition and estimates remaining bag life.	The lime injection rates were determined during performance tests.
b. QA/QC Practices and Criteria	The bag leak detections systems shall meet the requirements in 40 CFR Part 63 Subpart RRR § 63.1510(f) (Section II, Condition 10.14)	Calibration and certification of the accuracy of each monitoring device shall occur at least once every six months, according to the manufacturer's instructions. Maintenance of the control device shall occur in accordance with the manufacturer's instructions and recommendations.
c. Monitoring Frequency	Continuously	Daily checks are conducted to verify that the lime is free-flowing and to monitor and record the lime injection rate.

III. Justification

a. Background:
This facility manufactures coiled aluminum sheet from aluminum scrap.

Rational for Selection of Performance Indicators:

The bag leak detection system was selected as an indicator of baghouse performance as the systems are a means to determine bag filter condition and remaining life.

The lime injection rate was selected as an indicator since lime is injected in order to reduce HCl emissions, therefore, changes in the injection rate will directly affect the HCl emission.

The Secondary Aluminum Production MACT requires that delaquering kilns and group 1 furnaces controlled by lime-injected baghouses use bag leak detection devices and maintain the lime feeder setting at the same level established during the performance test. The CAM rule specifies that monitoring required for a MACT standard is presumptively acceptable monitoring, provided the monitoring is applicable to the performance of the control device (40 CFR Part 64 § 64.4(b)(4)). Since the MACT monitoring is for the same control device, the Division considers that the indicators are presumptively acceptable.

While the MACT requires that other parameters be monitored (such as inlet baghouse temperature), the permittee is required to monitor these parameters under the MACT requirements and they have not been specifically identified as CAM requirements.

b. Rational for Selection of Indicator Ranges:

The indicator ranges that were selected (when the bag leak detection system alarms and maintain lime injection rate at the same level established during the performance test) are consistent with the MACT requirements. As indicated above, since MACT monitoring is considered presumptively acceptable, the Division considers that the indicator range is also presumptively acceptable.