Facility Name: **Novelis Inc.**
City: Greensboro
County: Greene
AIRS #: 04-13-133-00001

Application #: TV-22261
Date Application Received: November 18, 2013
Permit No: 3341-133-0001-V-04-0

Program	Review Engineers	Review Managers
SSPP	Cynthia Dorrough	Dika Kuoh
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SSCP	N/A	N/A
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Novelis Incorporated** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Novelis Incorporated

2. Parent/Holding Company Name: Novelis Inc.

3. Previous and/or Other Name(s)

Keystone Resources- Aluminum Division
ALCAN Ingot & Recycling
ALCAN Rolled Products Company- Recycling.
ALCAN Aluminum Corporation

4. Facility Location

1261 Willow Run Road, Greensboro, Greene County, Georgia

5. Attainment or Non-attainment Area Location

This facility is located in Greene County, an attainment area for all criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3341-133-0001-V-03-0	May 19, 2009	Title V Operating Permit
3341-133-0001-V-03-1	November 15, 2010	Title V Permit Amendment: Installation of a rotogrinder in parallel with the existing rotogrinder to be ducted to Baghouse 6 (Source Code BAG6).
3341-133-0001-V-03-2	March 7, 2011	The removal of Induction Furnace #1 (Source Code: INF1), Induction Furnace # 2 (Source Code: INF2) and Pneumatic Conveyor (Source Code: PNEU)
3341-133-0001-V-03-3	June 19, 2012	The modification of Melt Furnace #3 (Source Code: FCE3) through the replacement of the burner and filter media, improvement of furnace's process automation and controls, increase furnace's capacity and relocate the furnace within the facility.
3341-133-0001-V-03-4	January 17, 2013	The modification of Baghouse 3 and Baghouse 6 to improve indoor dust collection, reduce the occurrence of material accumulation in the duct and upgrade the baghouse systems to conform to NPFA explosion prevention, mitigation and isolation techniques.
3341-133-0001-V-03-5	August 8, 2013	The modification of the exhaust system for Baghouse #3, Baghouse #4, and Baghouse #6 to increase dust collection efficiency and the re-routing of emissions from two rotogrinders (Source ID: SHRD) to Baghouse #4.
3341-133-0001-V-03-6	July 22, 2014	The replacement of Baghouse 5 (Air Pollution Control ID: BAG5) which controls Furnace #3 (Emission Unit ID: FCE3).
Off-Permit Change on 12/16/2009	December 16, 2009	Off-Permit Change to install three identical direct-fired sow pre-heaters - one for each melting furnace.
Off-Permit Change on 7/27/2009	July 27, 2009	Off-Permit Change to change the pick-up points for Baghouse 4 (BAG4) to collect fine spilled material and dust from additional floor sweeps.
Off-Permit Change on 7/27/2009	July 27, 2009	Off-Permit Change to add a new entry point in the weigh hopper that is located after the shredders (Source Code SHRD) and before the Decoater (Source Code DCTR). This will enable the facility to charge a new pre-shredded material.
Off-Permit Change on 8/7/2009	August 7, 2009	Off-Permit Change to add a new saw to cut coil prior to introducing the material into the Rotogrinder. The coil saw will be used to cut coil that cannot currently be processed in the Rotogrinder due to its shape and size.

D. Process Description

1. SIC Codes(s)

3341

2. Description of Product(s)

Novelis, Inc. operates a secondary aluminum production facility in Greensboro, Georgia. The facility recycles used beverage cans (UBC) and scrap aluminum into large stock ingots that are shipped to rolling mills where the ingots are rolled into coils for manufacturing new aluminum products. Aluminum (UBC and scrap) is shredded, decoated (hot air removal of coating), melted, and then cast into ingots.

3. Overall Facility Process Description

Novelis recycles used beverage cans and scrap aluminum into large stock ingots that are shipped to rolling mills where they are processed into aluminum coils. The aluminum coils are then shipped to can plants to be processed into new product beverage cans. Used beverage cans and other various aluminum class scraps are transported to the facility by rail car and truck and are held in storage until needed. The aluminum scrap is then processed accordingly through the shred department, charged directly into Furnace #1 (source code FCE1) or conveyed through the shred process. Some aluminum scrap is broken up and fed into a shredder (source code SHRD) reducing the aluminum to smaller inch sized pieces. In the shredding process, iron and steel are removed with a magnetic separator while dirt and other contamination is separated out using screening devices. Shredded aluminum is fed into a decoater (source code DCTR), which uses hot air to remove paint and lacquer. The decoater exhaust is routed to an incinerator (source code INR1) for destruction. The aluminum is then fed into one of three reverberatory furnaces (source codes FCE1, FCE2 and FCE3) for melting in which direct charge is conducted in the sidewells. Class scraps and alloy materials that are directly charged into the furnaces are stored in designated areas until they are ready to be charged. All paint-coated scraps are monitored accordingly prior to direct charging to the furnaces. The furnaces burn either natural gas or propane. Dross removal occurs at the furnaces. Molten metal is gravity fed to a natural gas or propane fired holding “Holder” furnace (source code HOLD). The function of the holder within the holding furnace is to clean the molten aluminum for casting and to transfer the metal to the casting unit. During the cleaning process, a rotary flux injector injects and mixes salt flux into the body of molten aluminum. The reaction causes dirt and contaminants (dross) to separate and float to the top or sink to the bottom of the furnace. Floating dross is removed by skimming with a forklift equipped with a ram. Samples of the metal are collected for analyses, and final adjustments to alloy contents of the molten aluminum can also be made in the holder prior to transfer to casting. Final alloy adjustments, salt flux injections, and dross removal are all completed prior to casting into ingots. Molten metal is then transferred through a Novelis compact degasser (source code ACD) to the direct chill casters. In the ACD, a mixture of chlorine and argon gases is injected into the molten aluminum to remove alkali metals and hydrogen gas. Impurities float to the top and are removed by skimming. Emissions from the degasser (source code ACD) are exhausted through the holding furnace (source code HOLD). Direct chill casters are used to form aluminum ingots weighing 30,000 to 60,000 pounds each.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is classified as major source under PSD it has potential to emit (PTE) of PSD regulated criteria pollutants over 100 tpy. Because it is one of the 28 named source categories, the major source threshold is 100 tpy for regulated pollutant as opposed to 250 tpy per year for regulated criteria pollutants.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y	✓		
PM_{10}	Y	✓		
$PM_{2.5}$	Y	✓		
SO_2	Y			✓
VOC	Y			✓
NO_x	Y			✓
CO	Y			✓
TRS	N/A			
H_2S	N/A			
Individual HAP	Y	✓		
Total HAPs	Y	✓		
Total GHGs	Y	✓		

3. MACT Standards

The facility is subject to federal rule 40 CFR 63 Subpart RRR "National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production".

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

No non-compliance issue exists at this time.

D. Operational Flexibility

None Applicable.

E. Permit Conditions

None Applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

Novelis recycles used beverage cans and scrap aluminum into large stock ingots that are shipped to rolling mills where they are processed into aluminum coils. The aluminum coils are then shipped to can plants to be processed into new product beverage cans. Used beverage cans and other various aluminum class scraps are transported to the facility by rail car and truck and are held in storage until needed. The aluminum scrap is then processed accordingly through the shred department, charged directly into Furnace #1 (source code FCE1) or conveyed through the shred process. Some aluminum scrap is broken up and fed into a shredder (source code SHRD) reducing the aluminum to smaller inch sized pieces. In the shredding process, iron and steel are removed with a magnetic separator while dirt and other contamination is separated out using screening devices. Shredded aluminum is fed into a decoater (source code DCTR), which uses hot air to remove paint and lacquer. The decoater exhaust is routed to an incinerator (source code INR1) for destruction. The aluminum is then fed into one of three reverberatory furnaces (source codes FCE1, FCE2 and FCE3) for melting in which direct charge is conducted in the sidewells. Class scraps and alloy materials that are directly charged into the furnaces are stored in designated areas until they are ready to be charged. All paint-coated scraps are monitored accordingly prior to direct charging to the furnaces. The furnaces burn either natural gas or propane. Dross removal occurs at the furnaces. Molten metal is gravity fed to a natural gas or propane fired holding "Holder" furnace (source code HOLD). The function of the holder within the holding furnace is to clean the molten aluminum for casting and to transfer the metal to the casting unit. During the cleaning process, a rotary flux injector injects and mixes salt flux into the body of molten aluminum. The reaction causes dirt and contaminants (dross) to separate and float to the top or sink to the bottom of the furnace. Floating dross is removed by skimming with a forklift equipped with a ram. Samples of the metal are collected for analyses, and final adjustments to alloy contents of the molten aluminum can also be made in the holder prior to transfer to casting. Final alloy adjustments, salt flux injections, and dross removal are all completed prior to casting into ingots. Molten metal is then transferred through a Novelis compact degasser (source code ACD) to the direct chill casters. In the ACD, a mixture of chlorine and argon gases is injected into the molten aluminum to remove alkali metals and hydrogen gas. Impurities float to the top and are removed by skimming. Emissions from the degasser (source code ACD) are exhausted through the holding furnace (source code HOLD). Direct chill casters are used to form aluminum ingots weighing 30,000 to 60,000 pounds each.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
SHRD	Shredders (including rotogrinder shredders)	40 CFR 63 Subpart RRR, Rule 391-3-1-.02(2)(b)1, Rule 391-3-1-.02(2)(e)1(ii)	3.2.1, 3.2.10, 3.3.2, 3.3.1, 3.3.3, 3.3.5, 3.3.7, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 4.2.11, 5.2.2, 5.2.3, 5.2.7, 5.2.9, 5.2.11,	BAG4 & BAG6	Baghouse
DCTR	Decoater	40 CFR 63 Subpart RRR, Rule 391-3-1-.02(2)(b)1, Rule 391-3-1-.02(2)(e)1(ii), Rule 391-3-1-.02(2)(g)2	3.2.1, 3.2.5, 3.2.7, 3.2.8, 3.2.9, 3.2.10, 3.2.11, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.8, 3.4.1, 3.4.2, 3.4.3, 4.2.2, 4.2.3, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 5.2.1, 5.2.5, 5.2.6, 5.2.7, 5.2.11, 5.2.13, 5.2.14, 6.1.7, 6.2.5, 6.2.6, 6.2.7	INR1	Decoater Incinerator
FCE1	Furnace #1	40 CFR 63 Subpart RRR Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2	3.2.1, 3.2.6, 3.2.7, 3.2.10, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.9, 3.3.12, 3.4.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 5.2.9, 5.2.10, 5.2.11, 5.2.13, 5.2.14, 6.1.7, 6.2.5, 6.2.6, 6.2.7	BAG1 & BAG2	Baghouse
FCE2	Furnace #2	40 CFR 63 Subpart RRR Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2	See FCE1	BAG1 & BAG2	Baghouse
FCE3	Furnace #3	40 CFR 63 Subpart RRR Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2	3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.6, 3.2.7, 3.2.10, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.3.9, 3.3.12, 3.4.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 4.2.12, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 5.2.9, 5.2.10, 5.2.11, 5.2.13, 5.2.14, 6.1.7, 6.2.5, 6.2.6, 6.2.7	BAG5	Baghouse
HOLD	Holder	40 CFR 63 Subpart RRR Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii) Rule 391-3-1-.02(2)(g)2	3.2.1, 3.2.7, 3.3.2, 3.3.3, 3.3.4, 3.3.10, 3.3.12, 3.4.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 5.2.5, 5.2.6, 5.2.10, 5.2.12, 6.2.5,	None	None
ACD	Compact Degasser	40 CFR 63 Subpart RRR Rule 391-3-1-.02(2)(b)1 Rule 391-3-1-.02(2)(e)1(ii)	3.3.2, 3.3.3, 3.3.4, 3.3.6, 3.3.9, 3.3.13, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 5.2.5, 5.2.10, 5.2.12, 6.2.5	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

C. Equipment & Rule Applicability

Choose the applicable option(s) below:

40 CFR 63 Subpart RRR, "National Emissions Standards for Hazardous Air Pollutants (NESHAP) from Secondary Aluminum Production", applies to any facility participating in the processing and manufacture of parts from secondary aluminum. Novelis is subject to this standard as a major source of HCl.

Georgia Rule 391-3-1-.02(2)(b), "Visible Emissions", applies to any emission unit subject to any other emission rule as listed in Georgia Rules 391-3-1-.02(2). Therefore, all the equipment listed in the table in III.B. are subject to Rule (b).

Georgia Rule 391-3-1-.02(2)(e), "Particulate Emission from Manufacturing Processes", applies to any equipment involved in any manufacturing process. All of the equipment listed in the table in III.B are classified as one process. Because the equipment was constructed after July 2, 1968, the "new equipment" standard in paragraph 1.(i) applies.

Georgia Rule 391-3-1-.02(2)(g), "Sulfur Dioxide", applies to any equipment that burns fuel. The three melting furnaces (source codes FCE1, FCE2, FCE3), the holding furnace (source code HOLD), and the decoater (source code DCTR) all burn fuel and are therefore subject to Rule (g).

Emission and Operating Caps:

The facility is limited to 18,166 tons per month of aluminum scrap through the decoater (source code DCTR) to ensure the facility avoids PSD thresholds.

The Permittee shall not discharge or cause the discharge into the atmosphere particulate matter (PM) emissions in excess of 0.065 lb/ton through the decoater (source code DCTR) to ensure that the facility avoids PSD thresholds. The limit was established based upon a 50% margin of compliance added to the most recent stack test results and this would ensure that the facility maintains their equipment to keep PM emissions as low as possible.

The decoater is required to maintain a temperature at or above the average temperature established during the last-approved performance test and documented in the OM&M for the decoater incinerator (source code INR1) in compliance with the current MACT standard requirements.

The Permittee shall not discharge or cause the discharge into the atmosphere hydrochloric acid (HCl) emissions in excess of 0.47 lb/ton through the decoater (source code DCTR) based on existing equipment design and reasonable operation and maintenance practices. The limit was established based upon a 50% margin of compliance added to the most recent stack tests and this would ensure that the facility maintains their equipment to keep HCl emissions as low as possible.

Multiunit shredding system (source code SHRD) was constructed prior to 1978 and is used for shredding aluminum scrap. SHRD is equipped with a baghouse (source codes BAG4 and BAG6) to control particulate matter. The shredder is subject to a PSD avoidance limit for PM of 0.0425 lb/ton of aluminum.

Furnace #1 (source code FCE1) has a heat input capacity of 26 MMBtu/hr, was constructed in 1996, and is used for melting aluminum and aluminum solids. FCE1 is capable of firing on natural gas and propane. Furnace #2 (source code FCE2), has a heat input capacity of 20 MMBtu/hr, was constructed in 1997, and is used for melting aluminum and aluminum solids. FCE2 is capable of firing on natural gas and propane. The FCE1 and FCE2 exhausts are combined and controlled by two baghouses (source codes BAG1 & BAG2) to control particulate matter. Furnace #1 and Furnace #2, combined, are subject to a PSD avoidance limit for PM of 6 lb/hr.

In Permit Amendment 3341-133-0001-V-03-3, the net increase in emissions associated with the modification of Furnace #3 does not constitute a major modification under PSD, Novelis proposed practically enforceable limits for Furnace #3, of those the proposed PM limit would replace the existing PM limit for Furnace #3. As demonstrated in the previous sections, the net emissions increase with the proposed limits are below the significant emission rate, therefore the limits are classified as PSD Avoidance limits.

The PSD Avoidance limits for the furnace were derived using the following equation:

[(Modified Furnace #3 Future PTE) – (Furnace #3 Past Actual Emissions)] = Net Increase or Decrease in Emissions

Pollutant	Proposed Limit (lb/hr)
PM	6.71
PM_{10}	4.43
$PM_{2.5}$	3.20
NO_x	8.67

The Limits for Furnace #3 are listed in the permit as Conditions 3.2.1 through 3.2.4

Holder (source code HOLD) has a heat input capacity of 17 MMBtu/hr, was constructed in 1992, and is used for processing molten metal prior to casting, maintain temperature of metal, and capable of melting aluminum solids. HOLD is capable of firing on natural gas and propane. The holder is subject to a PSD avoidance limit for PM of 0.044 lb/ton.

40 CFR 63, Subpart RRR establishes emission standards for particulate matter (PM), hydrochloric acid (HCl), and dioxins and furans (D/F). The emission standards for the shredder (source code SHRD), decoater (source code DCTR), Inline Fluxer (ACD), melting furnaces and holding furnace (source codes FCE1, FCE2, FCE3, HOLD) are found in 40 CFR 63.1505 and are listed in the permit as Conditions 3.3.1, 3.3.2, 3.3.12, and 3.3.13. 40 CFR 63, Subpart RRR establishes operating requirements for the affected sources as well. The operating requirements are found in 40 CFR 63.1506 and are listed in the permit as Conditions 3.3.4 through 3.3.11.

Georgia Rule (e) establishes emission limits for particulate emissions from the production of aluminum at Novelis. As discussed above, all of the equipment listed in the table in III.B operates as one process. The allowable PM emission rate is determined using the following equation:

$$E = 4.1 \times P^{0.67},$$

Where E is the emission rate in pounds per hour and P is the process input weight rate in tons per hour.

Georgia Rule (b) limits visible emissions from all the emission units at Novelis listed in the table in III.B. to 40% opacity.

Georgia Rule (g) limits the sulfur content of the fuel burned in all the fuel burning sources at Novelis to 2.5%. The fuel burning sources are the three melting furnaces (source codes FCE1, FCE2, FCE3), the holding furnace (source code HOLD), and the decoater (source code DCTR). These sources burn only natural gas and propane, which contain much less than 2.5% sulfur.

D. Compliance Status

No non-compliance issue exists at this time.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Permit Condition 3.2.1 establishes the PM PSD Avoidance limits for the shredder, decoater, holding furnace and Furnace #1, Furnace #2 and Furnace #3.

Permit Condition 3.2.2 establishes the NOx PSD Avoidance limit for Furnace #3.

Permit Condition 3.2.3 establishes the PM_{10} PSD Avoidance limit for Furnace #3.

Permit Condition 3.2.4 establishes the $PM_{2.5}$ PSD Avoidance limit for Furnace #3.

Permit Condition 3.2.5 limits the input of aluminum scrap to the decoater

Permit Condition 3.2.6 limits the input of coated aluminum in all three melting furnaces.

Permit Condition 3.2.7 prohibits the combustion of fuel other than natural gas or propane in Furnace #1, Furnace #2, Furnace #3, the Holding Furnace and the Decoater.

Permit Condition 3.2.8 requires the Permittee to operate the decoater only to remove paints, oils and finishes from aluminum scrap.

Permit Condition 3.2.9 requires the Permittee to maintain a temperature in the decoater at or above the termperature established during the last approved performance test documented in the OM&M Plan.

Permit Condition 3.2.10 requires the Permittee to operate the emission units in Table 3.1 with the associated air pollution control devices.

Permit Condition 3.2.11 limits HCl emissions from the decoated to 0.47 lb/ton.

Permit Conditions 3.3.1 through 3.3.11 list the requirements for 40 CFR 63 Subpart RRR

Permit Conditions 3.3.12 and 3.3.13 incorporate the Secondary Aluminum NESHAP emission limits for Group 1 furnaces (from 40 CFR 63.1505(i)) and in-line fluxers (from 40 CFR 63.1505(j)) at the request of the facility because they currently operate as a SAPU.

Permit Condition 3.4.1 requires the Permittee to comply with the requirements of Georgia Rule (b) for FCE1, FCE2, FCE3, HOLD, DCTR, ACD and SHRD.

Permit Condition 3.4.2 requires the Permittee to comply with Georgia Rule (e) for FCE1, FCE2, FCE3, HOLD, DCTR, ACD and SHRD.

Permit Condition 3.4.3 requires the Permittee to comply with Georgia Rule (g) for FCE1, FCE2, FCE3, HOLD and DCTR.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

Permit Condition 4.1.4 requires the Permittee to submit test reports to the US EPA's WebFIRE database in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63).

B. Specific Testing Requirements

Condition Nos. 4.2.1–4.2.9 are included in the permit according to the Subpart RRR MACT standard. The conditions require the development of a site-specific test plan, specify the production status while the performance tests are administered, performance test report contents, and the equations used to determine compliance with the emission limits specified in Section 3.3 of the Permit.

Condition 4.2.5 enforces PSD avoidance limits associated with Furnace #3.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Permit Condition 5.2.1 requires the Permittee to install, calibrate, maintain and operate a system to continuously monitoring and record the temperature of the decoater incinerator (Source Code: INR1).

Permit Condition 5.2.2 requires the installation of a continuous bag leak detection system as required in 40 CFR 63.1510(f) for Baghouses BAG1, BAG2, BAG4, BAG5 and BAG6.

Permit Condition 5.2.3 requires the Permittee to develop and maintain and Preventative Maintenance Program for the baghouses specified in Table 3.1.

Permit Conditions 5.2.4-5.2.13 are included in the permit according to the RRR MACT standard. The conditions outline the preparation and implementation of an OM&M plan, label inspections for the group 1 furnaces (melting and holding furnaces), the use of a monitoring device to record the feed/charge weight rate to or production weight from the melting and holding furnaces, monitoring requirements for reactive flux injection rates, lists the requirements for the section of the OM&M plan dealing with the furnaces, a scrap quality inspection plan, the equations used to determine compliance with emission limits specified in Section 3.3 of the Permit, and alternative compliance options.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

Permit Condition 6.1.5 requires any analysis or sampling records to be maintained. All such records should be retained for a period of at least five years, pursuant to Permit Condition 6.1.6. Permit Condition 6.1.7 details deviations that are to be included in the semiannual report required by Permit Condition 6.1.4.

B. Specific Record Keeping and Reporting Requirements

Permit Conditions 6.2.1 through 6.2.6 are added in accordance with 40 CFR 63, Subpart RRR. These conditions outline the procedures for the submittal of compliance reports, the drafting of a written operation plan in times of startup, shutdown, or malfunction, the submittal of semiannual reports, and record keeping.

Conditions 6.2.7 and 6.2.8 contain record keeping and reporting requirements that come from the old SIP permit. Records for the amount of aluminum scrap processed through DCTR and the amount of aluminum coils processed in the melting furnaces are required. These records are required to be submitted with the semiannual reports.

VII. Specific Requirements

A. Operational Flexibility

No alternative operating scenarios have been requested by the facility for any equipment in use.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

None Applicable.

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

Facility is operating in compliance at this time.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.