

**PERMIT NO. 3341-133-0001-V-05-0**

**ISSUANCE DATE:**



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### **Air Quality - Part 70 Operating Permit**

**Facility Name:** Novelis Incorporated  
**Facility Address:** 1261 Willow Run Road  
Greensboro, Georgia 30642 Greene County  
**Mailing Address:** 1261 Willow Run Road  
Greensboro, Georgia 30642  
**Parent/Holding Company:** Novelis, Inc.  
**Facility AIRS Number:** 04-13-133-00001

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

#### **The operation of a secondary aluminum smelter.**

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Application TV-358299 signed on November 25, 2019, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **50** pages.



DRAFT

Richard E. Dunn, Director  
Environmental Protection Division

---

**Table of Contents**

<b>PART 1.0</b>	<b>FACILITY DESCRIPTION .....</b>	<b>1</b>
1.1	Site Determination .....	1
1.2	Previous and/or Other Names .....	1
1.3	Overall Facility Process Description.....	1
<b>PART 2.0</b>	<b>REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY .....</b>	<b>2</b>
2.1	Facility Wide Emission Caps and Operating Limits.....	2
2.2	Facility Wide Federal Rule Standards.....	2
2.3	Facility Wide SIP Rule Standards.....	2
2.4	Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit.....	2
<b>PART 3.0</b>	<b>REQUIREMENTS FOR EMISSION UNITS .....</b>	<b>3</b>
3.1	Emission Units .....	3
3.2	Equipment Emission Caps and Operating Limits .....	4
3.3	Equipment Federal Rule Standards.....	6
3.4	Equipment SIP Rule Standards .....	10
3.5	Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit .....	10
<b>PART 4.0</b>	<b>REQUIREMENTS FOR TESTING.....</b>	<b>11</b>
4.1	General Testing Requirements .....	11
4.2	Specific Testing Requirements .....	12
<b>PART 5.0</b>	<b>REQUIREMENTS FOR MONITORING (Related to Data Collection) .....</b>	<b>17</b>
5.1	General Monitoring Requirements.....	17
5.2	Specific Monitoring Requirements .....	17
6.1	General Record Keeping and Reporting Requirements .....	23
6.2	Specific Record Keeping and Reporting Requirements.....	25
<b>PART 7.0</b>	<b>OTHER SPECIFIC REQUIREMENTS.....</b>	<b>30</b>
7.1	Operational Flexibility .....	30
7.2	Off-Permit Changes .....	30
7.10	Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA).....	31
7.11	Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990) .....	33
7.12	Revocation of Existing Permits and Amendments.....	34
<b>PART 8.0</b>	<b>GENERAL PROVISIONS .....</b>	<b>35</b>
8.1	Terms and References .....	35
8.2	EPA Authorities .....	35
8.3	Duty to Comply.....	35
8.4	Fee Assessment and Payment .....	36
8.5	Permit Renewal and Expiration .....	36
8.6	Transfer of Ownership or Operation .....	36
8.7	Property Rights.....	36
8.8	Submissions.....	37
8.9	Duty to Provide Information .....	37
8.10	Modifications .....	38
8.11	Permit Revision, Revocation, Reopening and Termination.....	38
8.12	Severability .....	39
8.13	Excess Emissions Due to an Emergency .....	39
8.14	Compliance Requirements .....	40

# Title V Permit

Novelis Incorporated

Permit No.: 3341-133-0001-V-05-0

---

8.15	Circumvention.....	42
8.16	Permit Shield.....	42
8.17	Operational Practices .....	43
8.18	Visible Emissions.....	43
8.19	Fuel-burning Equipment .....	43
8.20	Sulfur Dioxide.....	44
8.21	Particulate Emissions .....	44
8.22	Fugitive Dust.....	44
8.23	Solvent Metal Cleaning.....	45
8.24	Incinerators.....	46
8.25	Volatile Organic Liquid Handling and Storage .....	46
8.26	Use of Any Credible Evidence or Information .....	47
8.27	Internal Combustion Engines.....	47
8.28	Boilers and Process Heaters .....	48
<b>Attachments</b>	.....	<b>50</b>
	A. List of Standard Abbreviations and List of Permit Specific Abbreviations	
	B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups	
	C. List of References	

---

**PART 1.0 FACILITY DESCRIPTION****1.1 Site Determination**

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

**1.2 Previous and/or Other Names**

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

**1.3 Overall Facility Process Description**

The facility recycles used beverage cans and other scrap aluminum into large stock ingots for shipment to other facilities, where the ingots are transformed into coils. At the Greensboro plant scrap inputs are received at the facility by truck and rail and are held in storage until needed. This material is then either size-reduced in the shred department (source code SHRD or SHRD2) and then conveyed through the decoater to one of the three melt furnaces (source codes FCE1, FCE2, FCE3), or it is charged directly into one of the melt furnaces. The decoater (source code DCTR) uses hot air to remove paint and lacquer from the material. At the melt furnaces salt is added to the molten bath to separate impurities as dross. The dross is removed periodically. Molten metal is gravity fed to a holding furnace ("Holder," source code HOLD). At the holder a rotary flux injector injects and mixes salt flux into the molten aluminum to further clean the metal. Some primary aluminum is at times added to the furnaces. Molten metal is gravity-transferred from the holder, through a compact degasser (source code ACD), to the direct chill caster. In the ACD a mixture of chlorine and argon gas is injected into the molten aluminum to separate impurities. Those impurities are filtered out and removed. Emissions from the degasser are exhausted through the holder. The caster forms aluminum ingots weighing 30,000 to 60,000 pounds each. Alloy adjustments can be made to the molten metal at the melters and at the holder. Natural gas or propane is used to heat the decoater, the melt furnaces, and the holder. Several baghouses and an incinerator control particulate and other emissions from the manufacturing process.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

None applicable.

**2.2 Facility Wide Federal Rule Standards**

None applicable.

**2.3 Facility Wide SIP Rule Standards**

None applicable.

**2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None applicable.

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

**3.1 Emission Units**

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SHRD	Shredders (Including Associated Conveyance Equipment)	40 CFR 63 Subpart RRR, Rule 391-3-1-.02(2)(b)1, Rule 391-3-1-.02(2)(e)1(ii)	BAG6	Baghouse
SHRD2	Aluminum Shredding Line	40 CFR 63 Subpart RRR, Rule 391-3-1-.02(2)(b)1, Rule 391-3-1-.02(2)(e)1(ii)	BAG11	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	INR1 BAG10	Decoater Incinerator Baghouse
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	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	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	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	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)	None	None

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

**3.2 Equipment Emission Caps and Operating Limits**

3.2.1 The Permittee shall not discharge or cause the discharge into the atmosphere emissions of particulate matter (PM) in excess of the following:  
[PSD Avoidance]

Source	lb/hr	lb/ton
Shredder (SHRD)		0.0425
Shredder (SHRD2)		0.225
Decoater		0.065
Melt furnace 1 main hearth	6	
Melt furnace 1 charging wells		
Melt furnace 2 main hearth		
Melt furnace 2 charging wells		
Melt furnace 3 main hearth	6.71	
Melt furnace 3 charging wells		
Holding furnace		0.044

3.2.2 The Permittee shall not discharge or cause the discharge into the atmosphere emissions of nitrogen oxides (NOx) in excess of the following:  
[PSD Avoidance]

Source	lb/hr	tpy
Melt furnace 3 main hearth	8.67	
Melt furnace 3 charging wells		

3.2.3 The Permittee shall not discharge or cause the discharge into the atmosphere emissions of total particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>) in excess of the following:  
[PSD Avoidance]

Source	lb/hr	tpy
Melt furnace 3 main hearth	4.43	
Melt furnace 3 charging wells		

**Title V Permit**

- 3.2.4 The Permittee shall not discharge or cause the discharge into the atmosphere emissions of total particulate matter less than 2.5 micrometers in diameter (PM<sub>2.5</sub>) in excess of the following:  
[PSD Avoidance]

Source	lb/hr	tpy
Melt furnace 3 main hearth	3.20	
Melt furnace 3 charging wells		

- 3.2.5 The input of aluminum scrap to the decoater (source code DCTR) shall not exceed 18,166 tons per month.  
[PSD avoidance]
- 3.2.6 The input of coated aluminum in all three Melting Furnaces combined (source codes FCE1, FCE2, and FCE3) shall not exceed 1,000 tons per month.  
[PSD avoidance]
- 3.2.7 The Permittee may not burn any fuel other than natural gas or propane in the fuel burning sources (source codes FCE1, FCE2, FCE3, HOLD, and DCTR).  
[391-3-1-.03(2)(c)]
- 3.2.8 The Permittee shall operate DCTR only to remove paints, oil and finishes from aluminum scrap.  
[391-3-1-.03(2)(c)]
- 3.2.9 The Permittee shall maintain a temperature in the decoater incinerator (Source ID: INR1) at or above the average temperature established during the last-approved performance test and documented in the OM&M plan.  
[391-3-1-.03(2)(c)]
- 3.2.10 The Permittee shall operate the emission units in Table 3.1 with associated air pollution control device to control particulate matter emissions at all times that the emission units are operating.  
[391-3-1-.03(2)(c)]
- 3.2.11 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the decoater (source code DCTR) HCl emissions in excess of 0.47 pounds per ton.  
[391-3-1-.03(3)(a)5]



### 3.3 Equipment Federal Rule Standards

- 3.3.1 The Permittee must not discharge or cause to be discharged the following to the atmosphere:
- a. From aluminum scrap shredders (source codes SHRD and SHRD2), emissions in excess of 0.023 grams (g) of PM per dry standard cubic meter (dscm) (0.010 grain (gr) of PM per dry standard cubic foot (dscf)).  
[40 CFR 63.1505(b)1.]
  - b. From a scrap dryer/delacquering kiln/decoating kiln (source code DCTR), provided that the source is equipped with an afterburner with a design residence time of at least 1 second and the afterburner is operated at a temperature of at least 1400°F at all times, emissions in excess of:  
[40 CFR 63.1505(e)]
    - i. 0.10 kg of THC, as propane, per Mg (0.20 lb of THC, as propane, per ton) of feed/charge.  
[40 CFR 63.1505(e)(1)(i)]
    - ii. 0.15 kg of PM per Mg (0.30 lb per ton) of feed/charge.  
[40 CFR 63.1505(e)(1)(ii)]
    - iii. 5.0 µg of D/F TEQ per Mg ( $7.0 \times 10^{-5}$  gr of D/F TEQ per ton) of feed/charge.  
[40 CFR 63.1505(e)(1)(iii)]
- 3.3.2 In the event the facility elects to operate the following units as a SAPU (secondary aluminum production utility), it is mandatory the applicable requirements of 40 CFR 63.1505(i), 40 CFR 63.1505(j) and 40 CFR 63.1505(k) are met.
- 3.3.3 The Permittee shall operate all existing affected sources and control equipment according to 40 CFR 63.1506 (Conditions 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, and 3.3.11).  
[40 CFR 63.1506(a)]
- 3.3.4 The Permittee shall provide and maintain easily visible labels posted at each group 1 furnace, in-line fluxer, scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:  
[40 CFR 63.1506(b)]
- a. The type of affected source or emission unit.
  - b. The applicable operational standard(s) and control method(s) (work practice or 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 in the OM&M plan.
  - c. The afterburner operating temperature and design residence time for a scrap dryer/delacquering kiln/decoating kiln.

- 3.3.5 For each affected source or emission unit equipped with an add-on air pollution control device, the Permittee must:  
[40 CFR 63.1506(c)]
- a. 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 of Recommended Practice” (incorporated by reference in 40 CFR 63.1502);
  - b. 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; and
  - c. Operate each capture/collection system according to the procedures and requirements in the operation, maintenance and monitoring (OM&M) plan.
- 3.3.6 For each affected source or emission unit is subject to an emission limit in kg/Mg (lb/ton) of feed/charge, the Permittee must:  
[40 CFR 63.1506(d)]
- a. Except as provided in paragraph (c) of this condition, 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; and
  - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - c. The Permittee 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.
- 3.3.7 The Permittee must operate a bag leak detection system on baghouses BAG6, and BAG11 for the aluminum scrap shredders (source codes SHRD and SHRD2). The Permittee must:  
[40 CFR 63.1506(e)]
- a. Initiate corrective action within 1-hour of a bag leak detection system alarm and complete the corrective action procedures in accordance with the OM&M plan.
  - b. 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 Permittee takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.

## Title V Permit

- 3.3.8 The Permittee shall operate the afterburner (source code INR1) on the scrap dryer/delacquering kiln/decoating kiln (source code DCTR) as follows:  
[40 CFR 63.1506(g)]
- a. Maintain the 3-hour block average operating temperature of each afterburner at or above the average temperature established during the performance test.
  - b. Operate each afterburner in accordance with the OM&M plan.
- 3.3.9 The Permittee shall operate the group 1 furnaces with add-on air pollution control devices (Source Codes FCE1, FCE2, FCE3) as follows:  
[40 CFR 63.1506(m)]
- a. Initiate corrective action within 1-hour of a bag leak detection system alarm and complete the corrective action procedures in accordance with the OM&M plan.
  - b. 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 Permittee takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.
  - c. 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).
  - d. 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.
  - e. 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.
  - f. Operate each sidewell furnace such that:
    - i. The level of molten metal remains above the top of the passage between the sidewell and hearth during reactive flux injection, unless the hearth also is equipped with an add-on control device.
    - ii. Reactive flux is added only in the sidewell unless the hearth also is equipped with an add-on control device.

- 3.3.10 For the group 1 furnace with no add-on air pollution control device (source code HOLD), the Permittee must:  
[40 CFR 63.1506(n)]
- a. 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.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
- 3.3.11 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 Permittee 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 deviation.  
[40 CFR 63.1506(p)]
- 3.3.12 The Permittee, for all Group 1 furnaces (Source Codes FCE1, FCE2, FCE3, and HOLD), must use the limits in this condition to determine the emission standards for a SAPU:  
[40 CFR 63.1505(i)]
- a. 0.20 kg of PM per Mg (0.40 lb of PM per ton) of feed/charge from a Group 1 furnace (Source Codes FCE1, FCE2, FCE3 and HOLD), that is not a melting/holding furnace processing only clean charge.
  - b. 15  $\mu\text{g}$  of D/F TEQ per Mg ( $2.1 \times 10^{-4}$  gr of D/F TEQ per ton) of feed/charge from a Group 1 furnace. This limit does not apply if the furnace processes only clean charge.
  - c. 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge from a Group 1 furnace.
  - d. The Permittee may determine the emission standards for a SAPU by applying the Group 1 furnace limits on the basis of the aluminum production weight in each Group 1 furnace, rather than on the basis of feed/charge.

- 3.3.13 The Permittee, for the in-line fluxer (Source Code ACD), must use the limits in this condition to determine the emission standards for a SAPU:  
[40 CFR 63.1505(j)]
- a. 0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge.
  - b. 0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge.
  - c. The Permittee may determine the emission standards for a SAPU by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

**3.4 Equipment SIP Rule Standards**

- 3.4.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the following processes: FCE1, FCE2, FCE3, HOLD, DCTR, ACD, SHRD and SHRD2 any gases which exhibit visible emissions, the opacity of which is equal to or greater than, forty (40) percent opacity.  
[391-3-1-.02(2)(b)1]
- 3.4.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the following equipment: FCE1, FCE2, FCE3, HOLD, DCTR, ACD, SHRD and SHRD2 particulate emissions in excess of the rate derived from the expression  $E = 4.1 \times P^{0.67}$ , where E is the emission rate in pounds per hour and P is the process input weight rate in tons per hour.  
[391-3-1-.02(2)(e)1(ii)]
- 3.4.3 The Permittee shall not burn any fuel in the FCE1, FCE2, FCE3, HOLD, and DCTR, with sulfur content of greater than 2.5%, by weight.  
[391-3-1-.02(2)(g)]

**3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None Applicable.

**PART 4.0 REQUIREMENTS FOR TESTING****4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.  
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.  
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
- a. Method 1 for the locations of sampling points
  - b. Method 2 for the determination of flow rate
  - c. Methods 3 and 3B for the determination of stack gas molecular weight and for the determination of emission rate correction factor or excess air,
  - d. Method 4 for the determination of stack gas moisture,
  - e. Method 5 for the determination of particulate matter emissions,
  - f. Method 9 and the procedures of Section 1.3 of the above referenced document for the determination of opacity,
  - g. Method 23 for the determination of Polychlorinated Dibenzo- p- Dioxins and Polychlorinated Dibenzofurans from Stationary Sources,
  - h. Method 25A for the determination of THC, as propane,
  - i. Method 26A for the concentration of HCl, determination of Hydrogen Chloride emissions.
  - j. Method 201A in conjunction with Method 202 for PM<sub>10</sub> and PM<sub>2.5</sub> concentration for the determination of compliance with the limits in Conditions 3.2.3 and 3.2.4 for Furnace #3 (Source Code FCE3).

- k. Method 7 or 7E shall be used for the determination of nitrogen oxides concentration when determining compliance with the limit in Condition 3.2.2 for Furnace #3 (Source Code FCE3). The sampling time for each run shall be at least 60 minutes.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

## 4.2 Specific Testing Requirements

### Performance Test/Compliance Demonstration General Requirements

- 4.2.1 Prior to conducting any performance test required by 40 CFR 63 Subpart RRR (Conditions 4.2.2, 4.2.3 and 4.2.10), the Permittee must prepare 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 40 CFR 63.7(c).

[40 CFR 63.1511(a)]

- 4.2.2 The Permittee must conduct each performance test in accordance with the requirements and procedures set forth in 40 CFR 63.7(c).

[40 CFR 63.1511(b)]

- a. The Permittee must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
- b. Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.
- c. Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.
- d. Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.

- e. Compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

4.2.3 The Permittee must conduct a performance test on the emission units subject to Subpart RRR in Table 3.1 every 5 years following the initial performance test in accordance with the requirements of 40 CFR 63.1512 and 63.1513. The specific performance test/compliance demonstration requirements in accordance with 40 CFR 63.1512 must be followed for performing the tests required by Conditions 4.2.2, 4.2.3 and 4.2.10.  
[40 CFR 63.1511(e) and 40 CFR 63.1512]

4.2.4 The Permittee must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the Permittee must use the appropriate procedures and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report. The Permittee may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the Division:  
[40 CFR 63.1511(g)]

- a. The complete emission test report(s) used as the basis of the parameter(s) is submitted.
- b. The same test methods and procedures as required by this subpart were used in the test.
- c. The Permittee certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.
- d. All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in this test report.



4.2.5 The Permittee shall conduct performance tests on Furnace #3 (Source Code FCE3), once every five (5) years. A written report of the results of such performance tests shall be provided to the Division within sixty (60) days of the completion of testing:  
[391-3-1-.02(6)(b)1]

- a. Performance tests on the furnace, for PM (filterable and condensable) to verify and demonstrate compliance with Permit Condition 3.2.1.
- b. Performance test on the furnace, for nitrogen oxides (NOx) to verify and demonstrate compliance with Permit Condition 3.2.2.
- c. Performance test on the furnace, for PM<sub>10</sub> to verify and demonstrate compliance with Permit Condition 3.2.3.
- d. Performance test on the furnace, for PM<sub>2.5</sub> to verify and demonstrate compliance with Permit Condition No. 3.2.4.

**Equations For Determining Compliance**

4.2.6 Use the following equation to determine compliance with an emission limit for THC:  
[40 CFR 63.1513(a)]

$$E = \frac{C * MW * K_1 * K_2}{M_v * P * 10^6}$$

Where,

*E* = Emission rate of measured pollutant, kg/Mg (lb/ton) of feed;

*C* = Measured volume fraction of pollutant, ppmv;

*MW* = Molecular weight of measured pollutant, g/g-mole (lb/lb-mole): THC (as propane) = 44.11;

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

*K<sub>1</sub>* = Conversion factor, 1 kg/1000 g (1 lb/lb);

*K<sub>2</sub>* = Conversion factor, 1000 L/m<sup>3</sup> (1 ft<sup>3</sup>/ft<sup>3</sup>)

*M<sub>v</sub>* = Molar volume, 24.45 L/g-mole (385.3 ft<sup>3</sup>/lb-mole); and

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

- 4.2.7 Use the following equation to determine compliance with an emission limit for PM, HCl, and D/F:  
[40 CFR 63.1513(b)]

$$E = \frac{C * Q * K}{P}$$

Where,

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

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

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

$K$  = Conversion factor, 1 kg/1000 g (1 lb/7000 gr); and

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

- 4.2.8 Use the following equation to determine compliance with an HCl percent reduction standard:  
[40 CFR 63.1513(c)]

$$\%R = \frac{L_i - L_o}{L_i} * 100$$

Where,

$\%R$  = Percent reduction of the control device;

$L_i$  = Inlet loading of pollutant, kg/Mg (lb/ton); and

$L_o$  = Outlet loading of pollutant, kg/Mg (lb/ton).

- 4.2.9 To convert D/F measurements to TEQ units, the Permittee must use the procedures and equations in “Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and –Dibenzofurans (CDDs and CDFs) and 1989 Update” (EPA-625/3-89-016), incorporated by reference in Sec. 63.1502 of this subpart, available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia, NTIS No. PB 90-145756.  
[40 CFR 63.1513(d)]

## Title V Permit

- 4.2.10 Following approval of the site-specific test plan required by 40 CFR 63 Subpart RRR outlined in Permit Condition 4.2.1), the Permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for the aluminum shredder (Source ID: SHRD2) no later than 180 days after initial startup. The Permittee must use the appropriate procedures and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report and notify the Division no later than 90 days after conducting the initial performance test.  
[40 CFR 63.1511 and 40 CFR 63.1515]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.  
[391-3-1-.02(6)(b)1]

**5.2 Specific Monitoring Requirements**

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1, 40 CFR 63.1510(f) and 40 CFR 70.6(a)(3)(i)]
- a. Temperature of the decoater incinerator (Source ID: INR1) during operation.
- 5.2.2 The Permittee shall install, calibrate, maintain, operate, and continuously monitor a bag leak detection system as required in 40 CFR 63.1510(f) on baghouses BAG1, BAG2, BAG5, BAG6, BAG10 and BAG11.  
[40 CFR 63.1510(f)]
- 5.2.3 The Permittee shall develop and maintain a Preventive Maintenance Program for the baghouses specified in the table in Section 3.1 to assure that the provisions of Condition 8.17.1 are met. The program shall be subject to review and modification by the Division and shall include the differential pressure ranges that indicate proper operation for each baghouse. At a minimum, the following maintenance checks shall be made on at least a weekly basis, and a record of findings and corrective actions taken shall be kept in a maintenance log:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Record the pressure drop across each baghouse and ensure that it is within the appropriate range.
- b. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
- c. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

- d. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.
- e. Check dust collector hoppers and conveying systems for proper operation.

5.2.4 The Permittee must prepare and implement for each new or existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan. The plan must be accompanied by a written certification by the Permittee that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of 40 CFR 63, Subpart RRR. The Permittee must comply with all provisions of the OM&M plan as submitted to the permitting authority, unless and until the plan is revised in accordance with the following procedures. If the permitting authority determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of 40 CFR 63, Subpart RRR, the Permittee must promptly make all necessary revisions and resubmit the revised plan. If the Permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the Permittee submits a description of the changes and a revised plan incorporating them to the permitting authority. Each plan must contain the following information:

[40 CFR 63.1510(b)]

- a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device;
- b. A monitoring schedule for each affected source and emission unit;
- c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
- d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including;
  - i. Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
  - ii. Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in subpart A or this part.
- e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.

- f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (a) of this condition, including:
    - i. Procedures to determine and record the cause of a deviation or an excursion, and the time the deviation or excursion began and ended; and
    - ii. Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on pollution control device.
- 5.2.5 The Permittee must inspect the labels for each group 1 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.  
[40 CFR 63.1510(c)]
- 5.2.6 The Permittee must install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device. The Permittee must 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 40 CFR 63.1506(c) and record the results of each inspection.  
[40 CFR 63.1510(d)]
- 5.2.7 The Permittee must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from each affected source or emission unit over the same operating cycle or time period used in the performance test. As an alternative to a measurement device, the Permittee 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.  
[40 CFR 63.1510(e)]
- a. The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured. The Permittee may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the Permittee provides assurance through data and information that the affected source will meet the relevant emission standard.

## Title V Permit

- b. The Permittee 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.
- 5.2.8 The Permittee shall comply with the requirements of 40 CFR 63.1510(f)(1) regarding bag leak detection systems for fabric filters, 40 CFR 63.1510(g) regarding afterburners, 40 CFR 63.1510(h) regarding fabric filter inlet temperature, and 40 CFR 63.1510(i) regarding lime injection.  
[40 CFR 63.1510(f)(1), 40 CFR 63.1510(g), 40 CFR 63.1510(h), and 40 CFR 63.1510(i)]
- 5.2.9 These requirements apply to group 1 furnaces (with or without add-on air pollution control devices) or in-line fluxers. The Permittee must:  
[40 CFR 63.1510(j)]
- a. 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.
- i. The monitoring system must record the weight of each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
- ii. The accuracy of the weight measurement device must be  $\pm 1$  percent of the weight of the reactive component of the flux being measured. The Permittee 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  $\pm 1$  percent impracticable. A device of alternative accuracy will not be approved unless the Permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
- iii. The Permittee 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.
- b. 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 40 CFR 63.1512(o).
- c. 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:
- i. Gaseous or liquid reactive flux other than chlorine; and
- ii. Solid reactive flux.

- d. 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 40 CFR 63.1512(o).
- 5.2.10 The Permittee of a sidewell group 1 furnace using add-on pollution control devices must: [40 CFR 63.1510(n)]
- a. 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.
- b. Submit a certification of compliance with the operational standards in 40 CFR 63.1506(m)(6) for each 6-month reporting period. Each certification must contain the information in 40 CFR 63.1516(b)(2)(iii).
- 5.2.11 These requirements apply to group 1 furnaces that are not equipped with an add-on air pollution control device. [40 CFR 63.1510(o)]
- a. The Permittee must develop, in consultation with the Division, a written site-specific monitoring plan. The site-specific monitoring plan must be submitted to the permitting authority as part of the OM&M plan. The site-specific monitoring plan must contain sufficient procedures to ensure continuing compliance with all applicable emission limits and must demonstrate, based on documented test results, the relationship between emissions of PM, HCl, and D/F and the proposed monitoring parameters for each pollutant. Test data must establish the highest level of PM, HCl, and D/F that will be emitted from the furnace. This may be determined by conducting performance tests and monitoring operating parameters while charging the furnace with feed/charge materials containing the highest anticipated levels of oils and coatings and fluxing at the highest anticipated rate. If the permitting authority determines that any revisions of the site-specific monitoring plan are necessary to meet the requirements of 40 CFR 63, Subpart RRR, the Permittee must promptly make all necessary revisions and resubmit the revised plan to the permitting authority.
- b. Each site-specific monitoring plan must document each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards.
- c. Each site-specific monitoring plan must include provisions for unit labeling as required in 40 CFR 63.1510(c), feed/charge weight measurement (or production weight measurement) as required in 40 CFR 63.1510(e) and flux weight measurement as required in 40 CFR 63.1510(j).



5.2.12 The Permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each emission unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the Permittee must:  
[40 CFR 63.1510(t)]

- a. Calculate and record the total weight of material charged to each emission unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e) (Condition No. 5.2.7). If the Permittee chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds.
- c. Compute the 24-hour daily emission rate using the following equation:

$$E_{unit} = T_i * ER_i$$

Where,

$E_{unit}$  = The daily PM, HCl, or D/F emission rate for each processing unit for the 24-hour period;

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

$ER_i$  = The measured emission rate for emission unit **i** as determined in the performance test (lb/ton or µg/Mg of feed/charge); and

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

5.2.13 As an alternative to the procedures of 40 CFR 63.1510(t), the Permittee 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.  
[40 CFR 63.1510(u)]

**PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]

6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

6.1.5 Where applicable, the Permittee shall keep the following records:  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - i. None required to be reported in accordance with Condition 6.1.4.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any time during which the facility processes more than 18,166 tons per month of aluminum scrap into the DCTR.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
  - i. Deviations to be reported per 40 CFR 63.1516(b).
  - ii. Any 3-hour block average of an operating temperature of the incinerator INR1 that is less than the temperature established during the most recent performance test.

## 6.2 Specific Record Keeping and Reporting Requirements

### Reports

6.2.1 The Permittee must develop and implement a written startup and shutdown malfunction plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

[40 CFR 63.1516(a)]

- a. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

- b. Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- 6.2.2 As required by 40 CFR 63.10(e)(3), the Permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the Permittee must submit a report stating that no excess emissions occurred during the reporting period.  
[40 CFR 63.1516(b)]
- a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
- i. The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.
  - ii. The corrective action specified in the OM&M plan for a continuous opacity monitoring deviation was not initiated within 1 hour.
  - iii. The corrective action specified in the OM&M plan for visible emissions from an aluminum scrap shredder was not initiated within 1 hour.
  - iv. An excursion of a compliant process or operating parameter value or range (e.g., total reactive chlorine flux injection rate, definition of acceptable scrap, or other approved operating parameter).
  - v. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
  - vi. An affected source was not operated according to the requirements of 40 CFR 63, Subpart RRR.
  - vii. A deviation from the 3-day, 24-hour rolling average emission limit as calculated in Condition 5.2.12.
- b. Each report must include each of these certifications, as applicable:
- i. For each sidewell group 1 furnace with add-on air pollution control devices: “Each furnace was operated such that the level of molten metal remained above the top of the passage between the sidewell and hearth during reactive fluxing, and reactive flux, except for cover flux, was added only to the sidewell or to a furnace hearth equipped with an add-on air pollution control device for PM, HCl, and D/F emissions during this reporting period.”

- c. The Permittee 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 of values for each test method used for a particular type of emission point tested.
- 6.2.3 For the purposes of annual certifications of compliance required by 40 CFR Part 70 (Condition 8.14.1), the Permittee must certify continuing compliance based upon, but not limited to, the following conditions:  
[40 CFR 63.1516(c)]
- a. Any period of excess emissions, as defined in 40 CFR 63.1516(b)(1) (Condition No. 6.2.2(a)), that occurred during the year were reported as required by 40 CFR 63, Subpart RRR; and
  - b. All monitoring, recordkeeping, and reporting requirements were met during the year.

#### **Records Specific to 40 CFR 63 Subpart RRR**

- 6.2.4 In addition to the general records required by 40 CFR 63.10(b), the Permittee must maintain records of:  
[40 CFR 63.1517(b)]
- a. For each affected source and emission unit with emissions controlled by a fabric filter or a lime-injected fabric filter in which a bag leak detection system is used, the number of total operating hours for the affected source or emission unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.  
[40 CFR 63.1517(b)(1)]
  - b. For each affected source with emissions controlled by an afterburner (source code DCTR):  
[40 CFR 63.1517(b)(2)]
    - i. Records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken; and
    - ii. Records of annual afterburner inspections.
  - c. For each scrap dryer/delacquering kiln/decoating kiln and group 1 furnace, subject to D/F and HCl emission standards with emissions controlled by a lime-injected fabric filter, records of 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the 3-hour block average temperature exceeds the compliant operating parameter value +14 °C (+25 °F), with a brief explanation of the cause of the excursion and the corrective action taken.  
[40 CFR 63.1517(b)(3)]

- d. For each affected source and emission unit with emissions controlled by a lime-injected fabric filter:  
[40 CFR 63.1517(b)(4)]
- i. Records of inspections at least once every 8-hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 4-hour period for the subsequent 3 days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;
  - ii. If lime feeder setting is monitored, records of daily inspections of feeder setting, including records of any deviation of the feeder setting from the setting used in the performance test, with a brief explanation of the cause of the deviation and the corrective action taken.
  - iii. If lime addition rate for a noncontinuous lime injection system is monitored pursuant to the approved alternative monitoring requirements in 40 CFR 63.1510(v), records of the time and mass of each lime addition during each operating cycle or time period used in the performance test and calculations of the average lime addition rate (lb/ton of feed/charge).
- e. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.  
[40 CFR 63.1517(b)(5)]
- f. For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.  
[40 CFR 63.1517(b)(7)]
- g. Approved site-specific monitoring plan for a group 1 furnace without add-on pollution control devices with records documenting conformance with the plan.  
[40 CFR 63.1517(b)(8)]
- h. Operating logs for each group 1 sidewell furnace with add-on air pollution control devices documenting conformance with operating standards for maintaining the level of molten metal above the top of the passage between the sidewell and hearth during reactive flux injection and for adding reactive flux only to the sidewell or a furnace hearth equipped with a control device for PM, HCl, and D/F emissions.  
[40 CFR 63.1517(b)(10)]

- i. Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.  
[40 CFR 63.1517(b)(13)]
  - j. Records of annual inspections of emission capture/collection and closed vent systems.  
[40 CFR 63.1517(b)(14)]
  - k. Records of any alternative monitoring or test procedure.  
[40 CFR 63.1517(b)(15)]
  - l. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including;  
[40 CFR 63.1517(b)(16)]
    - i. Startup, shutdown, and malfunction plan;
    - ii. An OM&M plan; and
- 6.2.5 The Permittee shall maintain monthly records of aluminum production. The records shall be available for inspection or submittal to the Division upon request and contain:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Quantity of beverage cans (UBC), Class I Scrap, Coated Aluminum, Alloy Elements, and Pure Aluminum charged into the melting furnaces (source codes FCE1, FCE2, and FCE3).
  - b. Quantity of aluminum scrap charged into the decoater (source code DCTR).
  - c. Quantity of coated aluminum charged into the melting furnaces (source codes FCE1, FCE2, and FCE3).
- 6.2.6 The Permittee shall submit the following records with the reports required by Condition 6.1.4: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. The twelve consecutive month total quantity (tons) of used beverage cans (UBC), Class I Scrap, Coated Aluminum, Alloy Elements, and Pure Aluminum charged into the melting furnaces (source codes FCE1, FCE2, and FCE3).
  - b. The monthly quantity (tons) of aluminum scrap charged into the decoater (source code DCTR).
  - c. The monthly amount (tons) of coated aluminum charged into the melting furnaces (source codes FCE1, FCE2, and FCE3).



**PART 7.0 OTHER SPECIFIC REQUIREMENTS****7.1 Operational Flexibility**

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.  
[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

**7.2 Off-Permit Changes**

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:  
[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act. [Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

**7.3 Alternative Requirements**  
[White Paper #2]

Not Applicable

**7.4 Insignificant Activities**

(See Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**7.5 Temporary Sources**

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable

**7.6 Short-term Activities**

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

Not Applicable

**7.7 Compliance Schedule/Progress Reports**

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

Not applicable.

**7.8 Emissions Trading**

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

**7.9 Acid Rain Requirements**

Not Applicable

**7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)**

[391-3-1-.02(10)]

7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.

- a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.

## Title V Permit

- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
  - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.
  - ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
  - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
  - iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
  
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
  
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
  
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP\*eSubmit (information for establishing an account can be found at [www.epa.gov/rmp/rmpesubmit](http://www.epa.gov/rmp/rmpesubmit)). Electronic Signature Agreements should be mailed to:

MAIL

**Risk Management Program (RMP) Reporting Center  
P.O. Box 10162  
Fairfax, VA 22038**

COURIER & FEDEX

**Risk Management Program (RMP) Reporting Center  
CGI Federal  
12601 Fair Lakes Circle  
Fairfax, VA 22033**

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

#### **7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)**

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.  
[Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

**7.12 Revocation of Existing Permits and Amendments**

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

<b>Air Quality Permit and Amendment Number(s)</b>	<b>Dates of Original Permit or Amendment Issuance</b>
3341-133-0001-V-04-0	5/26/2015
3341-133-0001-V-01-1	3/12/2020

**7.13 Pollution Prevention**

None applicable.

**7.14 Specific Conditions**

None applicable

**PART 8.0 GENERAL PROVISIONS****8.1 Terms and References**

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence.  
[391-3-1-.02(2)(a)2]

**8.2 EPA Authorities**

- 8.2.1 Except as identified as “State-only enforceable” requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.  
[40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, “Inspections, Monitoring, and Entry.”  
[40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, “Emergency Powers.”  
[40 CFR 70.6(f)(3)(i)]

**8.3 Duty to Comply**

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

- 8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.  
[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

**8.4 Fee Assessment and Payment**

- 8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”  
[391-3-1-.03(9)]

**8.5 Permit Renewal and Expiration**

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.  
[391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.  
[391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation.  
[391-3-1-.03(10)(e)3(iii)]

**8.6 Transfer of Ownership or Operation**

- 8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.  
[391-3-1-.03(4)]

**8.7 Property Rights**

- 8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

## 8.8 Submissions

- 8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

**Georgia Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch  
Atlanta Tradeport, Suite 120  
4244 International Parkway  
Atlanta, Georgia 30354-3908**

- 8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

**Air and Radiation Division  
Air Planning and Implementation Branch  
U. S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-3104**

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]

- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

## 8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

[391-3-1-.03(10)(c)5]

- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request 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 that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]



## 8.10 Modifications

- 8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.  
[391-3-1-.03(1) through (8)]

## 8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:  
[391-3-1-.03(10)(d)1(i)]
- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;  
[391-3-1-.03(10)(e)6(i)(I)]
  - b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;  
[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
  - c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or  
[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
  - d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.  
[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.  
[391-3-1-.03(10)(e)6(ii)]

- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.  
[391-3-1-.03(10)(e)6(iii)]
- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]
- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

**8.12 Severability**

- 8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

**8.13 Excess Emissions Due to an Emergency**

- 8.13.1 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 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.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:
  - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. The Permitted facility was at the time of the emergency being properly operated;

## Title V Permit

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
  - d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission 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.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.  
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

### 8.14 Compliance Requirements

#### 8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. 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 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
- e. Any additional requirements specified by the Division.

8.14.2 Inspection and Entry

- a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:  
[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]
  - i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
  - iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
  
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.  
[391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
  
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
  
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.  
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

#### 8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that:  
[391-3-1-.02(2)(a)7(i)]
  - i. The best operational practices to minimize emissions are adhered to;
  - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
  - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.  
[391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) – New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.  
[391-3-1-.02(2)(a)7(iii)]

### 8.15 Circumvention

#### **State Only Enforceable Condition.**

- 8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission 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 the pollutants in the gases discharged into the atmosphere.  
[391-3-1-.03(2)(c)]

### 8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.  
[391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as “State only enforceable” does not have a Permit shield.

## 8.17 Operational Practices

- 8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.  
[391-3-1-.02(2)(a)10]

### **State Only Enforceable Condition.**

- 8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.  
[391-3-1-.02(2)(a)1]

## 8.18 Visible Emissions

- 8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.  
[391-3-1-.02(2)(b)1]

## 8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input.  
[391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.  
[391-3-1-.02(2)(d)]

- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.  
[391-3-1-.02(2)(d)]

## 8.20 Sulfur Dioxide

- 8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.  
[391-3-1-.02(2)(g)]

## 8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.  
[391-3-1-.02(2)(e)]

- a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

$E = 4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour.

$E = 55P^{0.11} - 40$ ; for process input weight rate above 30 tons per hour.

- b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and

P = process input weight rate in tons per hour.

## 8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

### **8.23 Solvent Metal Cleaning**

8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied:  
[391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
  - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
  - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
  - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.



## 8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:  
[391-3-1-.02(2)(c)1-4]
- a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
  - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
- a. It is a multiple chamber incinerator;
  - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
  - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

## 8.25 Volatile Organic Liquid Handling and Storage

- 8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.  
[391-3-1-.02(2)(vv)(1)]

## 8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, 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.  
[391-3-1-.02(3)(a)]

## 8.27 Internal Combustion Engines

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart III - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:  
[40 CFR 60.4200]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart III.
  - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart III.
  - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart III.
  - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart III. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
  - e. Maintain any records in accordance with Subpart III
  - f. Maintain a list of engines subject to 40 CFR 60 Subpart III, including the date of manufacture.  
[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.  
[40 CFR 60.4230]

- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for  $\leq 500$ hp engines at major sources, and constructed prior to December 19, 2002 for  $> 500$ hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to:

[40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
  - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
  - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.

[391-3-1-.02(6)(b)]

## 8.28 Boilers and Process Heaters

- 8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."

[40 CFR 63.11193]

## Title V Permit

- 8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."  
[40 CFR 63.7480]

**Attachments**

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References



## Title V Permit

### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	2
<b>Combustion Equipment</b>	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	0
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	0
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	0
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	0
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	0
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	0
	4. Stationary engines burning:	0
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	0
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	0
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	0
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	0
<b>Trade Operations</b>	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	4
<b>Maintenance, Cleaning, and Housekeeping</b>	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	0
	2. Portable blast-cleaning equipment.	1
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	0
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	1
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	0
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	0

## Title V Permit

### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Laboratories and Testing</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	0
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	1
<b>Pollution Control</b>	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	0
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	0
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	0
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	0
<b>Industrial Operations</b>	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	0
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	13
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	0
	iii) Kilns for firing ceramic ware.	0
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	0
	v) Bakery ovens and confection cookers.	0
	vi) Feed mill ovens.	0
	vii) Surface coating drying ovens	0
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	4
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	0	
5. Grain, food, or mineral extrusion processes	0	
6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	0	
7. Equipment for the mining and screening of uncrushed native sand and gravel.	0	
8. Ozonization process or process equipment.	0	
9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	0	
10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	0	
11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	0	
12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	0	
13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	0	



**INSIGNIFICANT ACTIVITIES CHECKLIST**

<b>Category</b>	<b>Description of Insignificant Activity/Unit</b>	<b>Quantity</b>
<b>Storage Tanks and Equipment</b>	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	0
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	3
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	2
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	0
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	40
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	0

**INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS**

<b>Description of Emission Units / Activities</b>	<b>Quantity</b>
Lime conveyance system	5
Air Compressors	3
Water Cooling Towers	4

## Title V Permit

Novelis Incorporated

Permit No.: 3341-133-0001-V-05-0

### ATTACHMENT B (continued)

### GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
GBH9-Includes FCE1 Main Hearth Door Hood Auxiliary Pull, Conveyor 25, Diverter Gate, Conveyor 26, Conveyor 21, Decoater Exit Conveyor-all associated with Baghouse 9	6	x	x	
SAL1 - Salt Storage Feeder/Cyclone for FCE1 - associated with Baghouses 1 & 2	1	x	x	
SAL2 - Salt Storage Feeder/Cyclone for FCE2 - associated with Baghouses 1 & 2	1	x	x	
SAL3 - Salt Storage Feeder/Cyclone for FCE3 - associated with Baghouse 5	1	x	x	
Casting Pit (CAST)-No controls, Emits inside of Building	1			x
Dross Cooling and Handling (DRSS)- No Control, Emits inside building	1	x	x	x
Discarded Fines Handling (FINE)- Torit Dust Collector at Dock, Emits inside Building	1	x	x	x
Lime Storage Silo (LIME) – Exhausts through Bin Vent Filter	1	x	x	
Scrap Receiving (RECV)	2	x	x	x
Plant Roads (ROAD)	1			x
Scrap Staging (STAG) - No Control, Emits inside building	1	x	x	x
GBH3- Includes: Conveyor 1, Fines, Rotex, Transfer from Conveyor 3 to Rotex, Rotex Fines, Weigh Hopper, Weigh Belt Conveyor, Vibrating Conveyor, Air Knife, Elevating Conveyor, Rotex Screener, Diverter Gate, Belt Conveyor - all associated with Baghouse 3	10	x	x	
GBH6-Includes: Apron Conveyor, Impact Breaker, Diverter Gate, Conveyor 2, Conveyor 3 - all associated with Baghouse 6.	5	x	x	
GBH7- Includes: Cyclone #7 and Vibrating Conveyor (no hood) & Chutes - associated with Baghouse 7.	4	x	x	

## Title V Permit

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

---

ATTACHMENT C

## LIST OF REFERENCES

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/ap42/index.html](http://www.epa.gov/ttn/chief/ap42/index.html).
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/software/tanks/index.html](http://www.epa.gov/ttn/chief/software/tanks/index.html).
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).