Missouri Department of dnr.mo.gov
NATURAL RESOURCES
Michael L. Parson, Governor
Carol S. Comer, Director

NOV 0 6 2019

Mr. Gary Odom
JW Aluminum
6100 South Broadway
Saint Louis, MO 63111

Re: Part 70 Operating Permit Renewal
Installation ID: 510-0118, Permit Number: OP2019-033

Dear Mr. Odom:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:bg

Enclosures

c: PAMS File: 2018-07-027

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2019-033
Expiration Date: NOV 0 6 2024
Installation ID: 510-0118
Project Number: 2018-07-027

Installation Name and Address
JW Aluminum
6100 South Broadway
Saint Louis, MO 63111
City of Saint Louis

Parent Company's Name and Address
JW Aluminum
435 Old Mount Holly Road
Goose Creek, SC 29445

Installation Description:
JW Aluminum operates an aluminum rolling facility on South Broadway in St. Louis, Missouri. Aluminum foil manufacturing facilities have a Standard Industrial Classification (SIC) number 3353 and a North America Industry Classification System (NAICS) number 331315.

This facility is an integrated rolling facility capable of producing approximately 60 million pounds of finished aluminum foil products per year. The installation is a major source of particulate matter, sulfur oxides, volatile organic compounds, and hazardous air pollutants. JW is an affected facility under the 40 CFR Part 63, Subpart RRR, *National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production Plants*.

NOV 0 6 2019
Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
	Melting and Holding Furnaces, and In-Line Fluxers
EU0002	401 Holding Furnace
EU0003	401 Degasser (In-Line Fluxer)
EU0005	404 Melting Furnace
EU0006	402 Holding Furnace
EU0007	402 Degasser (In-Line Fluxer)
EU0009	403 Melting Furnace
EU0010	403 Holding Furnace
EU0011	403 Degasser (In-Line Fluxer)
	Aluminum Casting Lines
EU0004	401 Caster
EU0008	402 Caster
EU0012	403 Caster
	Rolling Mills – Intermediate and Finish Mills
EU0018	420 Mill - Cold Mill
EU0020	421 Mill - Intermediate Mill
EU0022	422 Mill – Intermediate Mill
EU0024	423 Mill – Intermediate Mill
EU0056	134 Mill – Intermediate Mill
EU0058	135 Mill – Intermediate Mill
EU0060	136 Mill – Finish Mill
EU0062	137 Mill – Finish Mill
EU0064	138 Mill – Finish Mill
	Annealing Ovens – Gas Fired
EU0031	410 Annealing Oven
EU0032	411 Annealing Oven
EU0033	412 Annealing Oven
EU0036	440 Annealing Oven
EU0037	441 Annealing Oven

Emission Unit #	Description of Emission Unit
EU0038	442 Annealing Oven
EU0039	443 Annealing Oven
EU0071G	Seven (7) Annealing Ovens 150 through 156
EU0131G	Miscellaneous Natural Gas-Fired Space Heaters
	38 Reverber Ray DR-30 Natural Gas Heater (0.03 MMBtu/hr each)
	Sterling QV2 Natural Gas Heater (0.15 MMBtu/hr)
	Tank Building Natural Gas Heater (0.30 MMBtu/hr)
	Warehouse Natural Gas Heater (0.25 MMBtu/hr)
	Rapid SA St. Plant Natural Gas Heater (3.50 MMBtu/hr)
	61 NEF Natural Gas Heater (3.50 MMBtu/hr)
	61 SEF Natural Gas Heater (1.20 MMBtu/hr)
	61 SF Natural Gas Heater (3.50 MMBtu/hr)
	61 W Natural Gas Heater (5.80 MMBtu/hr)
	59 F Natural Gas Heater (2.25 MMBtu/hr)
	57 F Natural Gas Heater (2.25 MMBtu/hr)
	56 SF Natural Gas Heater (0.22 MMBtu/hr)
	56 CF Natural Gas Heater (0.30 MMBtu/hr)
	56 NF Natural Gas Heater (0.22 MMBtu/hr)
	41 F Natural Gas Heater (0.12 MMBtu/hr)
	40 F Natural Gas Heater (0.30 MMBtu/hr)
	40 EF Natural Gas Heater (0.20 MMBtu/hr)
	42 F Natural Gas Heater (0.20 MMBtu/hr)
	81 F Natural Gas Heater (0.15 MMBtu/hr)
	82 F Natural Gas Heater (010 MMBtu/hr)
	48 F Natural Gas Heater (0.10 MMBtu/hr)
	70 BH reznor HRTB-250 Natural Gas Heater (0 25 MMBtu/hr)
EU0136	Parts Washers
EU0138	Tip Ovens – 3.5 MMBtu/hr Natural Gas Fired Process Heater

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Emission Unit #	Description of Emission Unit
EU0015	Chlorine Room
EU0046G	Aluminum Scrap Balers
EU0118	Wood Shop
EU0135	Process Cooling Towers
EU0137	Six (6) Rolling Oil Storage Tanks
	Oil Stills

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
City of St. Louis Local Construction Permit #94-09-088

Emission Limititation:
Natural gas consumption shall not exceed 400 million cubic feet during any consecutive 12-month period for the entire facility. [Section III Condition D.]

Monitoring/Record Keeping:
The permittee shall keep accurate, up-to-date, readily available and easily understandable records for a minimum of five years of natural gas consumption in million cubic feet per month (see Attachment A). [Section V]

Reporting:
1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0002, EU0005, EU0006, EU0009, and EU0010 - Melting and Holding Furnaces (Group 1 Furnaces)[1]. EU0003, EU0007, and EU0011 - In-Line Fluxers

The melters are equipped with integral smoke incinerators. Drossing operations at the melters and holders are ventilated to the casting baghouse. Natural gas used as primary fuel and when necessary Used oil will be used as an alternate fuel at the 403 Melt Furnace. The Degassers are exhausted through the Casting Baghouse.

Emission Unit	Description
EU0002	401 Holding Furnace - Holds aluminum in a molten state. Manufacturer: Hauck Mfg. Co.; Design/Size: Reverberatory/30,000 Pounds, 6.5 MMBtu/hr. Fuel Type: Natural Gas.
EU0003	401 Degasser (In-Line Fluxer) – Heats molten aluminum and bubbles chlorine through the molten metal. Manufacturer: N/A; Design/Size: Incline with Cl2 and Inert Gas Degassing/1,000 Pounds. Fuel Type: Natural Gas
EU0005	404 Melting Furnace (formerly 402 Melt Furnace) - Melts aluminum ingots and scrap aluminum. Manufacturer: Gillepsi Powers, Inc.; Design/Size: Reverberatory/78,000 Pounds, 22 MMBtu/hr Fuel Type: Primary Fuel – Natural Gas
EU0006	402 Holding Furnace - Holds aluminum in a molten state. Manufacturer: Gillepsi Powers, Inc.; Design/Size: Reverberatory/30,000 Pounds, 6.5 MMBtu/hr.; Fuel Type: Natural Gas.
EU0007	402 Degasser (In-Line Fluxer) – Heats molten aluminum and bubbles chlorine through the molten metal. Manufacturer: N/A; Design/Size: Incline with Cl2 and Inert Gas Degassing/1,000 Pounds. Fuel Type: Natural Gas
EU0009	403 Melting Furnace - Melts aluminum ingots and scrap aluminum. Manufacturer: Gillepsi Powers, Inc.; Design/Size: Reverberatory/60,000 Pounds, 15 MMBtu/hr Fuel Type: Primary Fuel – Natural Gas; Alternate Fuel – Used Oil
EU0010	403 Holding Furnace - Holds aluminum in a molten state. Manufacturer: Gillepsi Powers, Inc.; Design/Size: Reverberatory/ 30,000 Pounds, 6.5 MMBtu/hr. Fuel Type: Natural Gas.
EU0011	403 Degasser (In-Line Fluxer) – Heats molten aluminum and bubbles chlorine through the molten metal. Manufacturer: N/A; Design/Size: Incline with Chlorine (Cl_2) and Inert Gas Degassing/1,000 Pounds; Fuel Type: Natural Gas

[1] A group 1 furnace is defined as a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricant, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing. [40 CFR 63.1503]

Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart RRR National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production
40 CFR Part 63 Subpart A General Provisions
10 CSR 10-6.400 Restrictions of Emissions of Particulate Matter from Industrial Processes

Emission Limitation/Standards:

1) The permittee shall not cause, suffer, allow or permit the emissions of particulate matter (PM) in any one (1) hour in excess of 9.85 pounds per hour (lb/hr) from 403 Melting Furnace (EU0009): [10 CSR 10-6.400(3)(A)1.]
2) The permittee shall not cause, allow or permit the emission of particulate matter from EU0009 in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases. [10 CSR 10-6.400(3)(A)4.]
3) Group 1 Furnaces (EU0002, EU0005, EU0006, EU0009, and EU0010): The permittee must use the limits in this paragraph to determine the emission standards for a secondary aluminum processing unit (SAPU). [40 CFR 63.1505(i)]
   a) 0.40 kilogram (kg) of PM per megagram (Mg) (0.80 lb of PM per ton) of feed/charge from a group 1 melting/holding furnace processing only clean charge at a secondary aluminum production facility that is a major source; and [40 CFR 63.1505(i)(2)]
   b) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge. [40 CFR 63.1505(i)(4)]
   c) 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. [40 CFR 63.1505(i)(6)]
4) In-line Fluxers (EU0003, EU0007, and EU0011): Except as provided in §63.1505(j)(3) for an in-line fluxer using no reactive flux material, the permittee must use the limits in this paragraph 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; [40 CFR 63.1505(j)(1)]
   b) 0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge. [40 CFR 63.1505(j)(2)]
   c) The emission limits in §63.1505(j)(1) and (j)(2) (listed above) do not apply to an in-line fluxer that uses no reactive flux materials. [40 CFR 63.1505(j)(3)]
   d) 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. [40 CFR 63.1505(j)(5)]
5) The permittee must comply with the emission limits calculated using the equations for PM and HCl in §63.1505(k)(1) and (2) for each secondary aluminum processing unit at a secondary aluminum production facility that is a major source. [40 CFR 63.1505(k)]
   i) The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of PM in excess of: [40 CFR 63.1505(k)(1)]

$$L_{c_{pm}} = \frac{\sum_{i=1}^{n}\left(L_{ti_{pm}} \times T_{ti}\right)}{\sum_{i=1}^{n}(T_{ti})}$$ Equation 1 of §63.1505(k)

Where

L_{tiPM} = The PM emission limit for individual emission unit i in §63.1505(i)(2) for a group 1 furnace or in §63.1505(j)(2) for an in-line fluxer;
T_{ti} = The mass of feed/charge for 24 hours for individual emission unit i; and
L_{cPM} = The daily PM emission limit for the secondary aluminum processing unit which is used to calculate the 3-day, 24-hour PM emission limit applicable to the SAPU.
NOTE: In-line fluxers using no reactive flux materials cannot be included in this calculation since they are not subject to the PM limit.

ii) The permittee must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of HCl in excess of: [40 CFR 63.1505(k)(2)]

$$L_{c_{HCl}} = \frac{\sum_{i=1}^{n}\left(L_{ti_{HCl}} \times T_{ti}\right)}{\sum_{i=1}^{n}(T_{ti})}$$ Equation 2 of §63.1505(k)

Where:
L_{tiHCl} = The HCl emission limit for individual emission unit i in §63.1505 (i)(4) for a group 1 furnace or in §63.1505(j)(1); and
L_{cHCl} = The daily HCl emission limit for the secondary aluminum processing unit which is used to calculate the 3-day, 24-hour HCl emission limit applicable to the SAPU.

Operating Requirements:

1) The permittee must operate all new and existing affected sources and control equipment according to the requirements §63.1506. [40 CFR 63.1506(a)(1)]
2) At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.1506(a)(5)]
3) The permittee must provide and maintain easily visible labels posted at each group 1 furnace (EU0002, EU0005, EU0006, EU0009, EU0010) and in-line fluxer (EU0003, EU0007, EU0011) 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 (e.g., group 1 furnace, in-line fluxer). [40 CFR 63.1506(b)(1)]
   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 operation, maintenance, and monitoring (OM&M) plan. [40 CFR 63.1506(b)(2)]
4) For each affected source or emission unit (EU0002, EU0005, EU0006, EU0009, EU0010, EU0003, EU0007, EU0011) 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 or facial inlet velocities as contained in the American Conference of Governmental Industrial Hygienists (ACGIH) Guidelines (incorporated by reference, see §63.14); [40 CFR 63.1506(c)(1)]

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 [40 CFR 63.1506(c)(2)]
c) Operate each capture/collection system according to the procedures and requirements in the OM&M plan. [40 CFR 63.1506(c)(3)]

5) The Permittee must:
a) Except as provided in §63.1506(d)(3), 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 [40 CFR 63.1506(d)(1)]
b) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan. [40 CFR 63.1506(d)(2)]
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, provided that: [40 CFR 63.1506(d)(3)]
i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and [40 CFR 63.1506(d)(3)(i)]
ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight. [40 CFR 63.1506(d)(3)(ii)]

6) For each in-line fluxer with emissions controlled by a lime injected fabric filter (EU0003, EU0007 and EU0011), the permittee must: [40 CFR 63.1506(k)]
a) For a bag leak detection system used to meet the monitoring requirements in §63.1510, the permittee must: [40 CFR 63.1506(k)(1)]
i) Initiate corrective action within one hour of a bag leak detection system alarm and complete the corrective action procedures in accordance with the OM&M plan. [40 CFR 63.1506(k)(1)(i)]
ii) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5% of the operating time during a six-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 one hour. If the permittee takes longer than one 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. [40 CFR 63.1506(k)(1)(ii)]
b) 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. [40 CFR 63.1506(k)(4)]

7) For each group 1 furnace with emissions controlled by a lime-injected fabric filter (EU0002, EU005, EU0006, EU0009, and EU0010), the permittee must: [40 CFR 63.1506(m)]
a) For a bag leak detection system used to meet the monitoring requirements in §63.1510, the permittee must: [40 CFR 63.1506(m)(1)]
i) Initiate corrective action within one hour of a bag leak detection system alarm. [40 CFR 63.1506(m)(1)(i)]
ii) Complete the corrective action procedures in accordance with the OM&M plan. [40 CFR 63.1506(m)(1)(ii)]
iii) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5% of the operating time during a six-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 one hour. If the permittee takes longer than one 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. [40 CFR 63.1506(m)(1)(iii)]

b) Maintain the three-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). [40 CFR 63.1506(m)(3)]

c) 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. [40 CFR 63.1506(m)(5)]

8) 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 a deviation. [40 CFR 63.1506(p)]

Monitoring:

1) The permittee must monitor all control equipment and processes according to the requirements in §63.1510. Monitoring requirements for each type of affected source and emission unit are summarized in Table 3 to Subpart RRR. [40 CFR 63.1510(a)]

2) 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. [40 CFR 63.1510(b)]

a) The permittee must comply with all of the 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 §63.1510 or 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:

i) 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. [40 CFR 63.1510(b)(1)]

ii) A monitoring schedule for each affected source and emission unit. [40 CFR 63.1510(b)(2)]

iii) 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 § 63.1505. [40 CFR 63.1510(b)(3)]

iv) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(1) Calibration and certification of accuracy of each monitoring device, at least once every six months, according to the manufacturer's instructions; and [40 CFR 63.1510(b)(4)(i)]

(2) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in subpart A of this part. [40 CFR 63.1510(b)(4)(ii)]

v) 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. [40 CFR 63.1510(b)(5)]

vi) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in 40 CFR §63.1510(b)(1), including:
(1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and [40 CFR 63.1510(b)(6)(i)]
(2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed. [40 CFR 63.1510(b)(6)(ii)]

vii) 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. [40 CFR 63.1510(b)(7)]

viii) 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 air pollution control device (EU0010, EU0020, EU0040, EU0050, EU0070 and EU0080). [40 CFR 63.1510(b)(8)]

b) The permittee must include, within the OM&M plan prepared in accordance with § 63.1510(b), the following information:

i) The identification of each emission unit in the secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011); [40 CFR 63.1510(s)(1)(i)]

ii) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011) and the date of its installation or application; [40 CFR 63.1510(s)(1)(ii)]

iii) The emission limit calculated for each secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011) and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit; [40 CFR 63.1510(s)(1)(iii)]

iv) Information and data demonstrating compliance for each emission unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011) with all applicable design, equipment, work practice or operational standards of subpart RRR; and [40 CFR 63.1510(s)(1)(iv)]

v) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011) and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in § 63.1510(t). [40 CFR 63.1510(s)(1)(v)]

c) The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

i) Any averaging among emissions of differing pollutants; [40 CFR 63.1510(s)(2)(i)]

ii) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011); [40 CFR 63.1510(s)(2)(ii)]

iii) The inclusion of any emission unit while it is shutdown; or [40 CFR 63.1510(s)(2)(iii)]

iv) The inclusion of any periods of startup, shutdown, or malfunction in emission calculations. [40 CFR 63.1510(s)(2)(iv)]

d) To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, permittee must submit a request to the applicable permitting authority containing the information required by §63.1510(s)(1) and obtain approval of the applicable permitting authority prior to implementing any revisions. [40 CFR 63.1510(s)(3)]

3) The permittee must inspect the labels for each group 1 furnace (EU0002, EU0005, EU0006, EU0009, and EU0010) and in-line fluxer (EU0003, EU0007, and EU0011) 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)]

4) The permittee must:

a) Install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device (EU0002 through EU0011). [40 CFR 63.1510(d)(1)]

b) 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)(2)]

5) 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, the affected source or emission unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011) over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority 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 +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. [40 CFR 63.1510(e)(1)]

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.

6) For emission units using a fabric filter to comply with the requirements of subpart RRR (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011), the permittee must install, calibrate, maintain, and continuously operate a bag leak detection system as required in §63.1510(f)(1). [40 CFR 63.1510(f)]

a) The permittee must install and operate a bag leak detection system for each exhaust stack of a fabric filter. [40 CFR 63.1510(f)(1)(i)]

b) Each triboelectric bag leak detection system must be installed, calibrated, operated, and maintained according to the ``Fabric Filter Bag Leak Detection Guidance," (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD-19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other bag leak detection systems must

be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations. [40 CFR 63.1510(f)(1)(ii)]

c) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less. [40 CFR 63.1510(f)(1)(iii)]

d) The bag leak detection system sensor must provide output of relative or absolute PM loadings. [40 CFR 63.1510(f)(1)(iv)]

e) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor. [40 CFR 63.1510(f)(1)(v)]

f) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel. [40 CFR 63.1510(f)(1)(vi)]

g) For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. [40 CFR 63.1510(f)(1)(vii)]

h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors. [40 CFR 63.1510(f)(1)(viii)]

i) The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time. [40 CFR 63.1510(f)(1)(ix)]

j) Following initial adjustment of the system, the permittee must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100% or decreased more than 50% over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition. [40 CFR 63.1510(f)(1)(x)]

7) For a group 1 furnace using a lime-injected fabric filter to comply with the requirements of subpart RRR (EU0002, EU0005, EU0006, EU0009, and EU0010):

a) The permittee must install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in subpart A of 40 CFR Part 63. [40 CFR 63.1510(h)(1)]

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

i) The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each three-hour block period. [40 CFR 63.1510(h)(2)(i)]

ii) The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in §63.1512(n). [40 CFR 63.1510(h)(2)(ii)]

iii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the director. [40 CFR 63.1510(h)(2)(iii)]

c) Continuous Lime Injection System - The permittee must verify that lime is always free-flowing by either: [40 CFR 63.1510(i)(1)]

i) (i) Inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at

least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period; or [40 CFR 63.1510(i)(1)(i)]

ii) (ii) Subject to the approval of the permitting agency, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the owner or operator must promptly initiate and complete corrective action, or

iii) (iii) Subject to the approval of the permitting agency, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the owner or operator must promptly initiate and complete corrective action. [40 CFR 63.1510(i)(1)(ii)]

d) The owner or operator of a Continuous Lime Injection System - The permittee must record the lime feeder setting once each day of operation. [40 CFR 63.1510(i)(2)]

e) At least once per month, the permittee must verify that the lime injection rate in pounds per hour (lb/hr) is no less than 90 percent of the lime injection rate used to demonstrate compliance during your most recent performance test. If the monthly check of the lime injection rate is below the 90 percent, the permitt must repair or adjust the lime injection system to restore normal operation within 45 days. The permittee may request from the permitting authority, an extension of up to an additional 45 days to demonstrate that the lime injection rate is no less than 90 percent of the lime injection rate used to demonstrate compliance during the most recent performance test. In the event that a lime feeder is repaired or replaced, the feeder must be calibrated, and the feed rate must be restored to the lb/hr feed rate operating limit established during the most recent performance test within 45 days. The permittee may request from the permitting authority, an extension of up to an additional 45 days to complete the repair or replacement and establishing a new setting. The repair or replacement, and the establishment of the new feeder setting(s) must be documented in accordance with the recordkeeping requirements of §63.1517. [40 CFR 63.1510(i)(4)]

8) The permittee must:

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 (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011). [40 CFR 63.1510(j)(1)]

i) The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. [40 CFR 63.1510(j)(1)(i)]

ii) The accuracy of the weight measurement device must be +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 +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. [40 CFR 63.1510(j)(1)(ii)]

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. [40 CFR 63.1510(j)(1)(iii)]

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). [40 CFR 63.1510(j)(2)]

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 [40 CFR 63.1510(j)(3)(i)]
   ii) Solid reactive flux. [40 CFR 63.1510(j)(3)(ii)]
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 40CFR §63.1512(o). [40 CFR 63.1510(j)(4)]
e) The permittee may apply to the director for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis. [40 CFR 63.1510(j)(5)]

9) Except as provided in §63.1510(u), the permittee must calculate and record the three-day, 24-hour rolling average emissions of PM, and HCl for each secondary aluminum processing unit on a daily basis. To calculate the three-day, 24-hour rolling average, the permittee must:
   a) Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR §63.1510(e). 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. [40 CFR 63.1510(t)(1)]
   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. [40 CFR 63.1510(t)(2)]
   c) Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU. [40 CFR 63.1510(t)(3)]
      i) Compute the 24-hour daily emission rates using the following equations: [40 CFR 63.1510(t)(4)]

$$E_{day} = \frac{\sum_{i=1}^{n}(T_i \times ER_i)}{\sum_{i}^{n} T_i}$$ Equation 4 of § 63.1510(t)

Where:

E_{day} = The daily PM, and HCl emission rate for the secondary aluminum 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 or Mg);

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

n = The number of emission units in the secondary aluminum processing unit.

   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. The SAPU is in compliance with an applicable emission limit if the 3-day, 24-hour rolling

average for each pollutant is no greater than the applicable SAPU emission limit determined in accordance with §63.1505(k)(1) and (2). [40 CFR 63.1510(t)(5)]

10) As an alternative to the procedures of §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)]

11) If the permittee wishes to use an alternative monitoring method to demonstrate compliance with any emission standard in subpart RRR, other than those alternative monitoring methods which may be authorized pursuant to §63.1510(j)(5) and §63.1510(v), the permittee may submit an application to the director. Any such application will be processed according to the criteria and procedures set forth in §63.1510(w)(1) through (6) (listed below). [40 CFR 63.1510(w)]
    a) The director will not approve averaging periods other than those specified in §63.1510. [40 CFR 63.1510(w)(1)]
    b) The permittee must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure. [40 CFR 63.1510(w)(2)]
    c) The permittee shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in §63.1510(w)(3)(i) through (iii): [40 CFR 63.1510(w)(3)]
        i) Data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach; [40 CFR 63.1510(w)(3)(i)]
        ii) A description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and [40 CFR 63.1510(w)(3)(ii)]
        iii) Data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s). [40 CFR 63.1510(w)(3)(iii)]
    d) The director will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the director will provide: [40 CFR 63.1510(w)(4)]
    e) Notice of the information and findings upon which the intended disapproval is based; and [40 CFR 63.1510(w)(4)(i)]
    f) Notice of opportunity for the permittee to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for permittee to provide additional supporting information. [40 CFR 63.1510(w)(4)(ii)]
    g) The permittee is responsible for submitting any supporting information in a timely manner to enable the director to consider the application prior to the performance test. Neither submittal of an application nor the director's failure to approve or disapprove the application relieves the permittee of the responsibility to comply with any provisions of subpart RRR. [40 CFR 63.1510(w)(5)]
    h) The director may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of subpart RRR. [40 CFR 63.1510(w)(6)]

Performance Testing:

1) The permittee must conduct a performance test every five years following the initial performance test. [40 CFR 63.1511(e)]
2) Prior to conducting any performance test required by this subpart, the permittee must prepare a site-specific test plan which satisfies all of the rule requirements, and must obtain approval of the plan pursuant to the procedures set forth in §63.7. Performance tests shall be conducted under such conditions as the director specifies to the permittee based on representative performance of the affected source for the period being tested. Upon request, the permittee shall make available to the director such records as may be necessary to determine the conditions of performance tests. [40 CFR 63.1511(a)]
3) The permittee must use the §63.1511(c)(1) through (9) methods in appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards: [40 CFR 63.1511(c)]
4) The permittee may use an alternative test method, subject to approval by the director. [40 CFR 63.1511(d)]
5) 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 §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 in this section and submit the information required by §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 Air Pollution Control Program: [40 CFR 63.1511(g)]
   a) The complete emission test report(s) used as the basis of the parameter(s) is submitted. [40 CFR 63.1511(g)(1)]
   b) The same test methods and procedures as required by this subpart were used in the test. [40 CFR 63.1511(g)(2)]
   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. [40 CFR 63.1511(g)(3)]
   d) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report. [40 CFR 63.1511(g)(4)]
6) When group 1 furnaces and/or in-line fluxers are included in a single existing SAPU or new SAPU, and the emissions from more than one emission unit within that existing SAPU or new SAPU are manifolded to a single control device, compliance for all units within the SAPU is demonstrated if the total measured emissions from all controlled and uncontrolled units in the SAPU do not exceed the emission limits calculated for that SAPU based on the applicable equation in §63.1505(k). [40 CFR 63.1511(h)]
7) For group 1 furnaces processing only clean charge:
   a) In the site-specific monitoring plan required by § 63.1510(o), the permittee must include data and information demonstrating compliance with the applicable emission limits. [40 CFR 63.1512(e)]
   b) The permittee must conduct performance tests to measure emissions of PM and HCl at the outlet of the control device. [40 CFR 63.1512(d)(2)]
   c) The permittee must conduct emission tests to measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the group 1 furnace processes only clean charge. [40 CFR 63.1512(e)(2)]

d) The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl. [40 CFR 63.1512(d)(3)] & [40 CFR 63.1512(e)(3)]

8) For the in-line fluxers:
   a) The permittee must conduct a performance test to measure emissions of HCl and PM or otherwise demonstrate compliance in accordance with §63.1512(h)(2). The emissions must be measured at the outlet of the control device. [40 CFR 63.1512(h)(1)]
   b) The permittee may choose to limit the rate at which reactive chlorine flux is added to an in-line fluxer and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all chlorine in the reactive flux added to the in-line fluxer is emitted as HCl. Under these circumstances, the permittee is not required to conduct an emission test for HCl. [40 CFR 63.1512(h)(2)]
9) For the Secondary Aluminum Processing Unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011), the permittee must conduct performance tests as described in §63.1512(j)(1) and (3). The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the three-day, 24-hour rolling average emission rates using the equation in § 63.1510(t). A performance test is required for: [40 CFR 63.1512(j)]
   a) Each group 1 furnace processing only clean charge to measure emissions of PM and either: [40 CFR 63.1512(j)(1)]
      i) Emissions of HCl (for determining the emission limit); or [40 CFR 63.1512(j)(1)(i)]
      ii) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard). [40 CFR 63.1512(j)(1)(ii)]
   b) Each in-line fluxer to measure emissions of PM and HCl. [40 CFR 63.1512(j)(3)]
10) During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. If compliance is demonstrated on the basis of the aluminum production weight, then the weight of aluminum produced by the emission unit or affected source must be measured instead of the feed/charge weight. [40 CFR 63.1512(k)]
11) For a group 1 furnace using a lime-injected fabric filter (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011), the permittee must use these procedures to establish an operating parameter value or range for the inlet gas temperature. [40 CFR 63.1512(n)]
   a) Continuously measure and record the temperature at the inlet to the lime-injected fabric filter every 15 minutes during the HCl performance test; [40 CFR 63.1512(n)(1)]
   b) Determine and record the 15-minute block average temperatures for the three test runs; and [40 CFR 63.1512(n)(2)]
   c) Determine and record the three-hour block average of the recorded temperature measurements for the three test runs. [40 CFR 63.1512(n)(3)]
12) The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate. [40 CFR 63.1512(o)]
   a) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl test, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the three test runs; [40 CFR 63.1512(o)(1)]

b) Record the identity, composition, and total weight of each addition of solid reactive flux for the three test runs; [40 CFR 63.1512(o)(2)]
c) Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using the following equation: [40 CFR 63.1512(o)(3)]

$W_t = F_1W_1 + F_2W_2$

Where,

W_t = Total chlorine usage, by weight;

F_1 = Fraction of gaseous or liquid flux that is chlorine;

W_1 = Weight of reactive flux gas injected;

F_2 = Fraction of solid reactive chloride flux that is chlorine (*e.g.*, F = 0.75 for magnesium chloride); and W_2 = Weight of solid reactive flux;

d) Divide the weight of total chlorine usage (W_t) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and [40 CFR 63.1512(o)(4)]
e) If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the applicable permitting authority. [40 CFR 63.1512(o)(5)]

13) The permittee must use the following equation to determine compliance with an emission limit for PM and HCl:

$$E = \frac{C \times Q \times K_1}{P}$$ [40 CFR 63.1513(b)]

Where,

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

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

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

K_1 = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and

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

14) The permittee must use the following equation to compute the mass-weighted PM emissions for a secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011). Compliance is achieved if the mass- weighted emissions for the secondary aluminum processing unit (EcPM) is less than or equal to the emission limit for the secondary aluminum processing unit (LcPM) calculated using Equation 1 in § 63.1505(k).

$$E_{C_{PM}} = \frac{\sum_{i=1}^{n} \left(E_{ti_{PM}} \times T_{ti}\right)}{\sum_{i=1}^{n} \left(T_{ti}\right)}$$ [40 CFR 63.1513(e)(1)]

Where,

EcPM = The mass-weighted PM emissions for the secondary aluminum processing unit;

EtiPM = Measured PM emissions for individual emission unit i;

Tti = The average feed rate for individual emission unit i during the operating cycle or performance test period;

n=The number of emission units in the secondary aluminum processing unit.

15) Use the following equation to compute the aluminum mass-weighted HCl emissions for the secondary aluminum processing unit (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011). Compliance is achieved if the mass-weighted emissions for the secondary

aluminum processing unit (EcHCl) is less than or equal to the emission limit for the secondary aluminum processing unit (LcHCl) calculated using Equation 2 in §63.1505(k).

$$E_{C_{HCl}} = \frac{\sum_{i=1}^{n}\left(E_{ti_{HCl}} \times T_{ti}\right)}{\sum_{i=1}^{n}\left(T_{ti}\right)} \qquad \text{[40 CFR 63.1513(e)(2)]}$$

Where,
EcHCl = The mass-weighted HCl emissions for the secondary aluminum processing unit; and
EtiHCl = Measured HCl emissions for individual emission unit i.

16) As an alternative to using the equations in 40 CFR 63.1513(e)(1), (e)(2), the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace (EU0002, EU0005, EU0006, EU0009 and EU0010) is in compliance with the emission limits for a new group 1 furnace in §63.1505(i) and that each existing in-line fluxer (EU0003, EU0007 and EU0011) is in compliance with the emission limits for a new in-line fluxer in §63.1505(j). [40 CFR 63.1513(e)(4)]

Recordkeeping:

1) As required by 40 CFR §63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart (Subpart RRR of 40 CFR Part 63). [40 CFR 63.1517(a)]
   a) The permittee must retain each record for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record (see Attachment D). The most recent two years of records must be retained at the facility. The remaining three years of records may be retained off site. [40 CFR 63.1517(a)(1)]
   b) The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche. [40 CFR 63.1517(a)(2)]
   c) The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software. [40 CFR 63.1517(a)(3)]
2) In addition to the general records required by 40 CFR §63.10(b), the permittee must maintain records of:
   a) For each affected source and emission unit with emissions controlled by a fabric filter (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011):
      i) If a bag leak detection system is used, the number of total operating hours for the affected source or emission unit during each six-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 (see attachment E). [40 CFR 63.1517(b)(1)(i)]
   b) For each group 1 furnace subject to HCl emission standards with emissions controlled by a lime-injected fabric filter (EU0002, EU0005, EU0006, EU0009, and EU0010), records of 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the three-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)]
   c) For each affected source and emission unit with emissions controlled by a lime-injected fabric filter (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011): [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; [40 CFR 63.1517(b)(4)(i)]

ii) If lime feeder setting is monitored, records of daily and monthly 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. If a lime feeder has been repaired or replaced, this action must be documented along with records of the new feeder calibration and the feed mechanism set points necessary to maintain the lb/hr feed rate operating limit. These records must be maintained on site and available upon request. [40 CFR 63.1517(b)(4)(ii)]

iii) If lime addition rate for a noncontinuous lime injection system is monitored pursuant to the approved alternative monitoring requirements in §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). [40 CFR 63.1517(b)(4)(iii)]

d) For each group 1 furnace (EU0002, EU0005, EU0006, EU0009, and EU0010) (with or without add-on air pollution control devices) or in-line fluxer, (EU0003, EU0007, and EU0011) 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 (see attachment F). [40 CFR 63.1517(b)(5)]

e) For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011), records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test (see Attachment G). [40 CFR 63.1517(b)(7)]

f) Approved site-specific monitoring plan for a group 1 furnace without add-on pollution control devices (EU0002, EU0005, EU0006, EU0009, and EU0010) with records documenting conformance with the plan. [40 CFR 63.1517(b)(8)]

g) Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements (see Attachment H). [40 CFR 63.1517(b)(13)]

h) Records of annual inspections of emission capture/collection and closed vent systems (see Attachment D). [40 CFR 63.1517(b)(14)]

i) Records for any approved alternative monitoring or test procedure. [40 CFR 63.1517(b)(15)]

j) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

i) OM&M plan. [40 CFR 63.1517(b)(16)(ii)]

ii) Site-specific secondary aluminum processing unit emission plan (if applicable). [40 CFR 63.1517(b)(16)(iii)]

k) For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-

hour period and calculations of three-day, 24-hour rolling average emissions (see Attachment I). [40 CFR 63.1517(b)(17)]

Reporting:

1) For the bag leak detection system, the permittee must submit the information described in §63.1515(b)(6) as part of the notification of compliance status report to document conformance with the specifications and requirements in §63.1510(f). [40 CFR 63.1512(q)]
2) For each group 1 furnace (EU0002, EU0005, EU0006, EU0009, and EU0010) and in-line fluxer (EU0003, EU0007, and EU0011) the permittee must submit the information described in §63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in §63.1506(b). [40 CFR 63.1512(r)]
3) The permittee must submit the information described in §63.1515(b)(2) as part of the notification of compliance status report to document conformance with the operational standard in §63.1506(c). [40 CFR 63.1512(s)]
4) As required by §63.9(b)(5), if the permittee intends to construct a new affected source or reconstruct[2] an affected source subject to subpart RRR, notification must be provided of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by §63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements. [40 CFR 63.1515(a)(4)]
   a) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence. [40 CFR 63.1515(a)(4)(i)]
5) As required by § 63.9(e) and (f), the permittee must provide notification of the anticipated date for conducting performance tests. The permittee must notify the director of the intent to conduct a performance test at least 60 days before the performance test is scheduled. [40 CFR 63.1515(a)(6)]
6) As required by 40 CFR §63.10(e)(3), the permittee must submit semiannual excess emissions reports within 60 days after the end of each six-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. [40 CFR 63.1516(b)(1)(i)]
      ii) An excursion of a compliant process or operating parameter value or range (e.g., total reactive chlorine flux injection rate, fabric filter inlet temperature, or other approved operating parameter). [40 CFR 63.1516(b)(1)(iv)]
      iii) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of subpart RRR. [40 CFR 63.1516(b)(1)(vi)]

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[2] Reconstruction means the replacement of components of an affected source or emission unit such the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new affected source, and it is technologically and economically feasible for the reconstructed source to meet relevant standard(s) established in subpart RRR. Replacement of the refractory in a furnace is routine maintenance and is not a reconstruction. The repair and replacement of in-line fluxer components (e.g. rotors/shafts, burner tubes, refractory, warped steel) is considered to be routine maintenance and is not considered a reconstruction. In-line fluxers are typically removed to a maintenance/repair area and are replaced with repaired units. The replacement of an existing in-line fluxer with a repaired unit is not considered a reconstruction. [40 CFR 63.1503]

iv) A deviation from the three-day, 24-hour rolling average emission limit for a secondary aluminum processing unit. [40 CFR 63.1516(b)(1)(vii)]

b) Each report must include the certification that, for each group 1 melting/holding furnace without add-on air pollution control devices and using pollution prevention measures that processes only clean charge material: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in §63.1505(i)(2) processed only clean charge during this reporting period." [40 CFR 63.1516(b)(2)(iv)]

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 or values for each test method used for a particular type of emission point tested. [40 CFR 63.1516(b)(3)]

7) Annual compliance certifications. For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:

a) Any period of excess emissions, as defined in 40 CFR §63.1516(b)(1), that occurred during the year were reported as required by subpart RRR. [40 CFR 63.1516(c)(1)]

b) All monitoring, record keeping, and reporting requirements were met during the year. [40 CFR 63.1516(c)(2)]

8) The permittee shall report to Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any deviation from or any exceedance of any of the terms imposed by 40 CFR Subpart RRR, or any malfunction which causes a deviation from or exceedance of the regulation.

Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-002

10 CSR 10-6.060 Construction Permits Required
City of St. Louis Local Construction Permit #94-09-088

Emission Limitation:

1) The permittee shall not cause, allow or permit the emission of particulate matter from the baghouse exhaust in a concentration in excess of 0.02 grain per standard cubic foot. [Section IV Condition B.]
2) The permittee shall not cause or permit to be discharged into the atmosphere from the exhaust stacks any visible emissions with an opacity greater than 20 percent for a period in excess of (6) minutes in any consecutive sixty (60) minute period. [Section IV Condition C.]

Equipment and Operating Parameters:

The permittee shall comply with the following equipment and operating parameters requirements:

1) All manufacturers' operating instruction manuals shall be kept and available at the site. [Section III Condition C.]
2) The baghouse shall be online while sources are in operation. [Section IV Condition A.]
3) Scrap contaminated with grease, paint, rubber and plastics is not permitted to be charged to the 403 melter (EU0009). [Section IV Condition G.]
4) The only combustion fuels to be used for the 403 furnaces (EU0009, EU0010, and EU0011) are natural gas and used oil generated on site. [Section IV Condition D.]
5) All used oil used for combustion in the 403 furnaces (EU0009, EU0010, and EU0011) shall comply with 40 CFR Part 279 "*Standards for the Management of Used Oil*", such as oil still bottoms and gear lubes. [Section IV Condition E.]

Monitoring/Record Keeping:

The permittee shall keep accurate, up-to-date, readily available and easily understandable records shall for a minimum of five years to verify all conditions of permit # 94-09-088. [Section V]

Reporting:

The permittee shall report to Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any deviation from or any exceedance of any of the terms imposed by Construction Permit #94-09-088, or any malfunction which causes a deviation from or exceedance of the regulation.

Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-003

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions[3]

Emission Limitation:Operational Limitation:

For 403 Melting Furnace (EU0009), when combusting used oil as alternate fuel:

1) The permittee shall not cause or permit the emission into the atmosphere of gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m3 of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period from the Emergency Generators. [10 CSR 10-6.260(3)(A)2.]
2) The permittee must limit the fuel sulfur content of the fuel oil to no more than 34,036 parts per million (ppm). [10 CSR 10-6.261(3)(C)]

Operational Limitation:

For emission units combusting natural gas: the permittee shall comply with the record keeping requirements of 10 CSR 10-6.261(4). [10 CSR 10-6.261(1)(A)]

Monitoring/Recordkeeping:

1) The permittee shall maintain a record of data, calculations, results, records, and reports from all fuel deliveries. [10 CSR 10-6.261(4)(A)3.]
2) The permittee must maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable: [10 CSR 10-6.261(4)(C)]
   a) The name, address, and contact information of the fuel supplier; [10 CSR 10-6.261(4)(C)1.]
   b) The type of fuel; [10 CSR 10-6.261(4)(C)2.]
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and [6.261(4)(C)3.]
   d) The heating value of the fuel. [10 CSR 10-6.261(4)(C)4.]
3) The permittee must retain all required reports and records on-site for a minimum of five years and make available within five business days upon written or electronic request by the director. [10 CSR 10-6.261(4)(F)]
4) The permittee must furnish the director all data necessary to determine compliance status. [10 CSR 10-6.261(4)(G)]

Reporting:

1) The permittee shall report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 10-6.050 to the director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be written and include the information listed in 10 CSR 10-6.261(4)(A)1.
2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

[3] 10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in State Implementation Plan. The provisions of 10 CSR 10-6.260 will expire, once 10 CSR 10-6.261 is incorporated into the federally-approved SIP as a final EPA action.

Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-004

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 40 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
3) Observations are only required when the emission units are operating and when the weather conditions allow.
4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Record Keeping:

1) The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms.
2) The permittee shall make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.
3) The permittee shall retain all records for five years.

Reporting:

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.

2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

EU0004, EU0008, and EU0012 – Aluminum Casting Lines	
Emission Unit	Description
EU0004	401 Caster
EU0008	402 Caster
EU0012	403 Caster

Permit Condition (EU0004, EU0008, and EU0012) - 001

10 CSR 10-6.060 Construction Permits Required
City of St. Louis Local Construction Permit #94-09-088

Equipment and Operating Parameters:

1) The permittee shall not process more than a total of 50,000 tons of prime aluminum ingot in any consecutive 12-month period through the three casting lines (EU0004, EU0008, and EU0012). [Section III Condition D.]
2) The permittee shall not process more than a total of 45 tons of chlorine in any consecutive 12-month period through the three casting lines (EU0004, EU0008, and EU0012) [Section III Condition D.]
3) The permittee shall not process more than a total of 45 tons of fluoride in any consecutive 12-month period through the three casting lines (EU0004, EU0008, and EU0012). [Section III Condition D.]

Monitoring/Record Keeping:

The permittee shall keep accurate, up-to-date, readily available and easily understandable records for a minimum of five years to verify all conditions of permit # 94-09-088 including: [Section V]

1) Prime Aluminum Ingot (tons/month);
2) Chlorine usage (tons/month);
3) Fluoride usage (tons/month); and

Reporting:

The permittee shall report to Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any deviation from or any exceedance of any of the terms imposed by Construction Permit #94-09-088, or any malfunction which causes a deviation from or exceedance of the regulation.

EU0018, EU0020, EU0022, EU0024, EU0056, EU0058, EU0060, EU0062, and EU0064 - Rolling Mills (Intermediate and Finish Mills)	
Emission Unit	Description
EU0018	420 Mill - Aluminum Cold Rolling Mill; Manufacturer: Hunter; Year Installed: 1975
EU0020	421 Mill - Aluminum Intermediate Rolling Mill; Manufacturer: Hunter; Year Installed: 1975
EU0022	422 Mill - Aluminum Intermediate Rolling Mill; Manufacturer: Hunter; Year Installed: 1975
EU0024	423 Mill - Aluminum Intermediate Rolling Mill; Manufacturer: Alumax; Year Installed: 1949
EU0056	134 Mill - Aluminum Intermediate Rolling Mill; Manufacturer: Alumax; Year Installed: 1949
EU0058	135 Mill - Aluminum Intermediate Rolling Mill; Manufacturer: Alumax; Year Installed: 1949
EU0060	136 Mill - Aluminum Finish Rolling Mill; Manufacturer: Alumax; Year Installed: 1949
EU0062	137 Mill - Aluminum Finish Rolling Mill; Manufacturer: Alumax; Year Installed: 1949
EU0064	138 Mill - Aluminum Finish Rolling Mill; Manufacturer: Hunter; Year Installed: 1949

Permit Condition (EU0018) -001, Permit Condition (EU0020, EU0022, EU0024, EU0056, EU0058) - 001, (EU0060, EU0062, EU0064)-001

10 CSR 10-5.451 Control of Emissions from Aluminum Foil Rolling

Emission Limitation:

1) Cold Rolling Mill - 420 Mill (EU0018):
   a) Rolling lubricants used on emission unit EU0018 shall consist of low vapor pressure lubricants composed of saturated oils and additives. For purposes of this subparagraph, low vapor pressure shall be defined as less than 1.0 millimeter of mercury (mmHg) at one hundred degrees Fahrenheit (100°F). [10 CSR 10-5.451(3)(A)1.A.]
   b) The initial boiling point of the as-received oils shall be three hundred eighty degrees Fahrenheit (380°F) or greater. [10 CSR 10-5.451(3)(A)1.B.]
   c) The initial boiling point of the as-applied rolling lubricants shall be greater than three hundred eighty degrees Fahrenheit (380°F). [10 CSR 10-5.451(3)(A)1.C.]
   d) The inlet or as-applied rolling lubricant temperatures at each mill shall not exceed one hundred fifty-five degrees Fahrenheit (155°F) and such temperatures shall be monitored at all times that the mill is in operation. [10 CSR 10-5.451(3)(A)1.D.]
2) Intermediate Rolling Mills - 421, 422, 423, 134, 135 Mills (EU0020, EU0022, EU0024, EU0056, EU0058), and Finishing Mills – 136, 137, and 138 Mills (EU0060, EU0062, and EU0064):
   a) Rolling lubricants used on the intermediate and finish mills shall consist of low vapor pressure lubricants composed of saturated oils and additives. For purposes of this subparagraph, low vapor pressure shall be defined as less than 1.0 mmHg at one hundred degrees Fahrenheit (100°F). [10 CSR 10-5.451(3)(A)2.A.]
   b) The initial boiling point of the as-received oils shall be three hundred thirty-five degrees Fahrenheit (335°F) or greater. [10 CSR 10-5.451(3)(A)2.B.]
   c) The initial boiling point of the as-applied rolling lubricants shall be greater than three hundred degrees Fahrenheit (300°F). [10 CSR 10-5.451(3)(A)2.C.]

d) D. The inlet or as-applied rolling lubricant temperatures at each mill shall not exceed one hundred sixty degrees Fahrenheit (160°F) and such temperatures shall be monitored at all times that the mill is in operation. [10 CSR 10-5.451(3)(A)2.D.]

Monitoring:

1) All incoming shipments of oil shall be sampled and a distillation range test shall be performed using American Society for Testing and Materials (ASTM) methods D86-99, Standard Method for Distillation of Petroleum Products or other methods approved by the director. The results of such tests shall be used for compliance with 10 CSR 10-5.451(3)(A)1.B and (3)(A)2.B. [10 CSR 10-5.451(5)(A)]
2) A grab sample of the as-applied rolling lubricants shall be taken on a monthly basis from each mill during any month that a mill is in operation. A distillation range test shall be performed using ASTM methods. The results of such tests shall be used to determine compliance with 10 CSR 10-5.451(3)(A)1.C. and (3)(A)2.C. [10 CSR 10-5.451(5)(B)]
3) Compliance with 10 CSR 10-5.451 (3)(A)1.D. and (3)(A)2.D. shall be met with continuous monitoring and recording of the rolling lubricant temperature. [10 CSR 10-5.451(5)(C)]

Recordkeeping:

1) The permittee shall maintain records of the following (see attachment J): [10 CSR 10-5.451(4)]
   a) Rolling lubricant formulations with identification of all oils and additives.
   b) The initial and final boiling points of all as-received oil shipments.
   c) The initial boiling points of the as-applied rolling lubricants on a monthly basis.
   d) The continuous temperature of the as-applied rolling lubricants.
2) All records of rolling lubricant formulations, distillation tests for oils, as-applied rolling lubricants and rolling lubricant temperatures shall be retained for a period of at least five (5) years and be immediately available for inspection upon request by the department or any agency with proper authority.

Reporting:

The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any deviation from or any exceedance of any of the terms imposed by 10 CSR 10-5.451, or any malfunction which causes a deviation from or exceedance of the regulation.

Permit Condition (EU0018) -002, Permit Condition (EU0020, EU0022, EU0024, EU0056, EU0058) - 002, (EU0060, EU0062, EU0064)-002

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 40 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
3) Observations are only required when the emission units are operating and when the weather conditions allow.
4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Record Keeping:

1) The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms.
2) The permittee shall make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.
3) The permittee shall retain all records for five years.

Reporting:

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

Permit Condition (EU0018) -003, and
Permit Condition (EU0020, EU0022, EU0024) - 003,

10 CSR 10-6.400 Restriction of Particulate Matter From Industrial Processes

Emission Limitation:

1) The permittee shall not cause, suffer, allow or permit the emissions of particulate matter (PM) in any one (1) hour from the emission units listed in the table below in excess of the rates specified in the following table: [10 CSR 10-6.400(3)(A)1.]

Emission Unit	PM Limit (lb/hr)
EU0018	30.51
EU0020	11.73

Emission Unit	PM Limit (lb/hr)
EU0022	15.10
EU0024	8.94

2) The permittee shall not cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases. [10 CSR 10-6.400(3)(A)4.]

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis)

EU0031 through EU0033, EU0036 through EU0039 and EU0071G – Annealing Ovens EU0131G – Miscellaneous Natural Gas-Fired Space Heaters EU0138 – Tip Oven	
Emission Unit	Description
EU0031	410 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Consolidated Engineering ; Year Installed: 1975 Capacity – 10.2 MMBtu/hr; Primary Fuel – Natural Gas
EU0032	411 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Consolidated Engineering ; Year Installed: 1975 Capacity – 10.2 MMBtu/hr; Primary Fuel – Natural Gas
EU0033	412 Annealing Oven - Used to anneal aluminum after rolling. Seco/Warwick, S/N: 303-88; Year Installed: 1987 Capacity – 10.2 MMBtu/hr; Primary Fuel – Natural Gas
EU0036	440 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Seco/Warwick; Order # 43848; Year Installed: 1989 Capacity – 9.0 MMBtu/hr; Primary Fuel – Natural Gas
EU0037	441 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Seco/Warwick; Order # 43848; Year Installed: 1989 Capacity – 3.5 MMBtu/hr; Primary Fuel – Natural Gas
EU0038	442 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Seco/Warwick; Order # 43848; Year Installed:1989 1989 Capacity – 3.5 MMBtu/hr; Primary Fuel – Natural Gas
EU0039	443 Annealing Oven - Used to anneal aluminum after rolling. Manufacturer: Seco/Warwick; Order # 43848; Year Installed:1989 Capacity – 3.5 MMBtu/hr; Primary Fuel – Natural Gas
EU0071G	Seven Annealing Ovens 150 through 156 - Used to anneal aluminum after rolling. Primary Fuel – Natural Gas Ovens 151 and 152: Capacity – 3.5 MMBtu/hr each; Manufacturer: Hunter; Year Installed:1968 Ovens 150, 153 through 156: Capacity – 3.5 MMBtu/hr each; Oven 150 - Manufacturer: Industrial Furnaces; Year Installed: 1965 Oven 153 - Manufacturer: Lindbergh Industrial Corp.; Year Installed: Pre. 1967 Oven 154 - Manufacturer: Hunter; Year Installed: 1967 Oven 155 - Manufacturer: Consolidated; Year Installed: Pre. 1975 Oven 156 - Manufacturer: Consolidate; Year Installed: 1975
EU0131G	Miscellaneous Natural Gas-Fired Space Heaters; Each less than 10 MMBtu/hr Heat input
EU0138	Tip Oven – Natural gas-fired oven used to preheat aluminum handling components and removed accumulated moisture prior to contact with molten aluminum. Manufacturer: Unitherm; Capacity – 3.5 MMBtu/hr

Permit Condition (EU0031 through EU0033, EU0036 through EU0039 and EU0071G) -001, Permit Condition (EU0131G) - 001, and (EU0138) - 001

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions[4]

Operational Limitation:

For emission units combusting natural gas: the permittee shall comply with the record keeping requirements of 10 CSR 10-6.261(4). [10 CSR 10-6.261(1)(A)]

Monitoring/Recordkeeping:

1) The permittee shall maintain a record of data, calculations, results, records, and reports from all fuel deliveries. [10 CSR 10-6.261(4)(A)3.]
2) The permittee must maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable: [10 CSR 10-6.261(4)(C)]
   a) The name, address, and contact information of the fuel supplier; [10 CSR 10-6.261(4)(C)1.]
   b) The type of fuel; [10 CSR 10-6.261(4)(C)2.]
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and [6.261(4)(C)3.]
   d) The heating value of the fuel. [10 CSR 10-6.261(4)(C)4.]
3) The permittee must retain all required reports and records on-site for a minimum of five years and make available within five business days upon written or electronic request by the director. [10 CSR 10-6.261(4)(F)]
4) The permittee must furnish the director all data necessary to determine compliance status. [10 CSR 10-6.261(4)(G)]

Reporting:

1) The permittee shall report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 10-6.050 to the director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be written and include the information listed in 10 CSR 10-6.261(4)(A)1.
2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

[4] This regulation is state enforceable only. When this regulation is incorporated into the SIP, this permit condition will be state and federally enforceable.

Permit Condition (EU0031 through EU0033) - 002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Work Practice Standards:

1) As stated in §63.7500, the permittee must comply with the following applicable work practice standard: [Items 3 of Table 3 to Subpart DDDDD of Part 63]
   a) The permittee shall conduct a tune-up of the 410, 411, and 412 Annealing Ovens annually as specified in §63.7540.
2) At all times, The permittee must operate and maintain the 410, 411, and 412 Annealing Ovens in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the ovens. [§63.7500(a)(3)]

Continuous Compliance Demonstration with the Work Practice Standards:

1) The permittee must conduct a tune-up of the 410, 411, and 412 Annealing Ovens annually as specified in §63.7540 (a)(10)(i) through (vi) (listed below).
   a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; [§63.7540(a)(10)(i)]
   b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; [§63.7540(a)(10)(ii)]
   c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown) ; [§63.7540(a)(10)(iii)]
   d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications; [§63.7540(a)(10)(iv)]
   e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and [§63.7540(a)(10)(v)]
   f) Maintain on-site and submit, if requested by the director, a report containing the information in §63.7540 (a)(10)(vi)(A) through (C) (listed below), [§63.7540(a)(10)(vi)]
      i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the ovens; [§63.7540(a)(10)(vi)(A)]
      ii) A description of any corrective actions taken as a part of the tune-up; and [§63.7540(a)(10)(vi)(B)]
      iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. [§63.7540(a)(10)(vi)(C)]

2) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [§63.7540(a)(13)]
3) The permittee must report each instance in which the permittee did not meet operating limit in Tables 3 to this subpart that applies to the permittee. These instances are deviations from the operating limits, respectively, in this subpart. These deviations must be reported according to the requirements in §63.7550. [§63.7540(b)]

Reporting:

1) *Notification*:
   a) If the permittee intends to use a fuel other than natural gas to fire the unit(s) during a period of natural gas curtailment or supply interruption, as defined in §63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. The notification must include the information specified in §63.7545(f)(1) through (5) (listed below). [§63.7545(f)]
      i) Company name and address. [§63.7545(f)(1)]
      ii) Identification of the affected unit. [§63.7545(f)(2)]
      iii) Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began. [§63.7545(f)(3)]
      iv) Type of alternative fuel that the permittee intends to use. [§63.7545(f)(4)]
      v) Dates when the alternative fuel use is expected to begin and end. [§63.7545(f)(5)]
   b) If the permittee has switched fuels or made a physical change to the unit(s) and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: [§63.7545(h)]
      i) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the unit(s) that have switched fuels, were physically changed, and the date of the notice. [§63.7545(h)(1)]
      ii) The currently applicable subcategory under this subpart. [§63.7545(h)(2)]
      iii) The date upon which the fuel switch or physical change occurred. [§63.7545(h)(3)

2) *Reports:*
   a) The permittee must submit each report in the table below that applies to the permittee. [§63.7550(a) and Table 9 to Subpart DDDDD of 40 CFR Part 63]

The permittee Must Submit a	The Report Must Contain	The Permittee Must Submit the Report
1. Compliance report	a. Information required in §63.7550(c)(1) and (5); and	Every 5 years according to the requirements in §63.7550(b).
	b. If there are no deviations the requirements for work practice standards for periods of startup and shutdown in Table 3 to this subpart that apply to the permittee, a statement that there were no deviations from work practice standards during the reporting period; and	
	c. If the permittee has deviation from a work practice standard for periods of startup and shutdown, during the reporting period, the report must contain the information in §63.7550(d).	

   b) Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report, according to §63.7550(h)(3), by the date in Table 9 to Subpart DDDDD of 40 CFR Part 63and according to the requirements in §63.7550(b)(1) through (4) (listed below). For units that are subject only to a requirement to conduct subsequent annual, tune-up according to §63.7540(a)(10), and not subject to emission limits or Table 4 operating limits, the permittee may submit only a 5-year compliance report, as applicable, as specified in §63.7550(b)(1) through (4), instead of a semi-annual compliance report. [§63.7550(b)]
      i) The first compliance report must cover the period beginning on the compliance date that is specified for each unit in §63.7495 and ending on December 31 within 5 years, after January 31, 2016 as specified in §63.7495. [§63.7550(b)(1)]
      ii) The first 5-year compliance report must be postmarked or submitted no later than January 31. [§63.7550(b)(2)]
      iii) Each 5-year compliance reports must cover the applicable 5-year periods from January 1 to December 31. [§63.7550(b)(3)]
      iv) Each 5-year compliance reports must be postmarked or submitted no later than January 31. [§63.7550(b)(4)]
      v) The permittee may submit the first and subsequent compliance reports according to the dates specified in Section V of this Permit instead of according to the dates in §63.7550(b)(1) through (4) (listed above). [§63.7550(b)(5)]
   c) A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule. [§63.7550(c)]
      i) For the requirements of a tune up the permittee must submit a compliance report with the information in §63.7550(c)(5)(i) through (iii), §63.7550 (xiv) and (xvii), and §63.7550(c)(5)(iv) (listed below). [§63.7550(c)(1)]
         (1) Company and Facility name and address. [§63.7550(c)(5)(i)]

(2) Process unit information. [§63.7550(c)(5)(ii)]
(3) Date of report and beginning and ending dates of the reporting period. [§63.7550(c)(5)(iii)]
(4) The total operating time during the reporting period. [§63.7550(c)(5)(iv)]
(5) Include the date of the most recent tune-up for each unit subject to only the requirement to an annual tune-up according to §63.7540(a)(10). Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. [§63.7550(c)(5)(xiv)]
(6) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.7550(c)(5)(xiv)]

d) For each deviation from the work practice standards for periods of startup and shutdown, the compliance report must additionally contain the information required in §63.7550(d)(1) and (2) (listed below). [§63.7550(d)]
   i) A description of the deviation and which work practice standard from which the permittee deviated. [§63.7550(d)(1)]
   ii) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken. [§63.7550(d)(2)]

Recordkeeping:

1) The permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
2) If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to this subpart, and the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. [§63.7555(h)]
3) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
4) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]
5) The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. [§63.7560(c)]

Permit Condition (EU0036 through EU0039) - 002, (EU0071G) – 002, and (EU0138) - 002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Work Practice Standards:

At all times, The permittee must operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boilers. [§63.7500(a)(3)]

Notification:

1) If the permittee intends to use a fuel other than natural gas to fire the unit(s) during a period of natural gas curtailment or supply interruption, as defined in §63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. The notification must include the information specified in §63.7545(f)(1) through (5) (listed below). [§63.7545(f)]
   a) Company name and address. [§63.7545(f)(1)]
   b) Identification of the affected unit. [§63.7545(f)(2)]
   c) Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began. [§63.7545(f)(3)]
   d) Type of alternative fuel that the permittee intends to use. [§63.7545(f)(4)]
   e) Dates when the alternative fuel use is expected to begin and end. [§63.7545(f)(5)]
2) If the permittee has switched fuels or made a physical change to the units(s) and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: [§63.7545(h)]
   a) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the boiler(s) that have switched fuels, were physically changed, and the date of the notice. [§63.7545(h)(1)]
   b) The currently applicable subcategory under this subpart. [§63.7545(h)(2)]
   c) The date upon which the fuel switch or physical change occurred. [§63.7545(h)(3)

Recordkeeping:

1) The permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
2) If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to this subpart, and the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. [§63.7555(h)]

3) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
4) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]
5) The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. [§63.7560(c)]

Permit Condition (EU0138) - 003

10 CSR 10-6.060 Construction Permits Required
City of St. Louis APCP Construction Permit # 94-10-106, Issued January 23, 1995

Equipment and Operating Parameters:

1) The permittee shall only burn natural gas in the oven. [Section II Condition A.]
2) The permittee shall not use the evaporating process for drying any VOC compounds. [Section II Condition B.]

Monitoring/Record Keeping/Reporting:

1) The permittee shall report any process changes to the operation. [Section II Condition C.]
2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

EU0136 – Parts Washers	
Emission Unit	Description
EU0136	Two (2) 100-Gallon each Parts Washers (Cold Cleaners). Part's cleaner sheet plant Maintenance and part's cleaner maintenance shop.

Permit Condition (EU0136) - 001

10 CSR 10-5.300 Control of Emissions from Solvent Cleaning

Emission Limitation:

1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)). [10 CSR 10-5.300(3)(A)1.A]
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements of subparagraph (3)(A)1.A and (3)(A)1.B of 10 CSR 10-5.300. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

Operational Limitation/Equipment Specification:

The permittee shall comply with the following operational limitations and equipment specifications unless an exemption under 10 CSR 10-5.300(1)(D) applies:

1) Equipment specifications:
   a) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir, which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]
   b) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the director and the EPA. [10 CSR 10-5.300(3)(A)1.D]
   c) When one (1) or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
      i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F) [10 CSR 10-5.300(3)(A)1.E(I)]
      ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
      iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
   d) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(3)(A)1.F]
   e) If an internal drainage facility as in 10 CSR 10-5.300(3)(A)1.F cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
   f) Solvent sprays shall be a solid fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [10 CSR 10-5.300(3)(A)1.H]
   g) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-5.300(3)(A)1.I]
   h) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices: [10 CSR 10-5.300(3)(A)1.J]
      i) A freeboard ratio of at least 0.75 [10 CSR 10-5.300(3)(A)1.J(I)]
      ii) Water cover (solvent must be insoluble in and heavier than water) [10 CSR 10-5.300(3)(A)1.J(II)]
      iii) Other control system that has a mass balance demonstrated overall VOC emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director and EPA prior to use. [10 CSR 10-5.300(3)(A)1.J(III)]
2) Operating procedures:
   a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [10 CSR 10-5.300(3)(B)1.A]
   b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]

c) Whenever a cold cleaner fails to perform within the operating parameters established by 10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is restarted to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D]
e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the 10 CSR 10-5.300 or an equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]
f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]

3) Operator and Supervisor Training:
a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning process. [10 CSR 10-5.300(3)(C)1]
b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator. [10 CSR 10-5.300(3)(C)2]
c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months. [10 CSR 10-5.300(3)(C)3]

Monitoring/ Recordkeeping:

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment K): [10 CSR 10-5.300(4)(B)]
a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]
b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]
2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (See Attachment L). The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment (Attachment D). These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule. [10 CSR 10-5.300(4)(A]
3) The permittee shall keep records of solvent metal cleaning training as required by 10 CSR 10-5.300(3)(C) (Attachment M).
4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)(E)]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements and
St. Louis City Ordinance 68657 §16 Open Burning Restrictions

1) No person shall cause, suffer, allow or permit the open burning of refuse.
2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos
The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the director.

10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors
This is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170
Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
    a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
    b) Paving or frequent cleaning of roads, driveways and parking lots;
    c) Application of dust-free surfaces;
    d) Application of water; and
    e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants
1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250 Asbestos Abatement Projects
Certification, Accreditation, and Business Exemption Requirements
This is a State Only permit requirement.
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage
1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited
No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)
No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)
1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
2) 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 of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 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 the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 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.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained 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 the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

Permit Duration
10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C
This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

General Record Keeping and Reporting Requirements
10 CSR 10-6.065(5)(C)1.C
1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice

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

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plan Under Section 112(r)
10 CSR 10-6.065(5)(C)1.D
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

Severability Clause
10 CSR 10-6.065(5)(C)1.F
In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements
10 CSR 10-6.065(5)(C)1.G

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(5)(C)1.

Incentive Programs Not Requiring Permit Revisions
10 CSR 10-6.065(5)(C)1.H
No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(5)(C)1.I
There are no reasonably anticipated operating scenarios.

Compliance Requirements
10 CSR 10-6.065(5)(C)3
1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

c) Whether compliance was continuous or intermittent;
d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield
10 CSR 10-6.065(5)(C)6

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions
10 CSR 10-6.065(5)(C)7

1) An emergency or upset as defined in 10 CSR 10-6.065(5)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two 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 any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Operational Flexibility
10 CSR 10-6.065(5)(C)8

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.

Off-Permit Changes
10 CSR 10-6.065(5)(C)9

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. This written notice shall describe each 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 permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
d) The permit shield shall not apply to these changes.

Responsible Official
10 CSR 10-6.020(2)(R)34
The application utilized in the preparation of this permit was signed by Gary Odom, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening-Permit for Cause
10 CSR 10-6.065(5)(E)6
This permit shall be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis
10 CSR 10-6.065(5)(E)1.C
This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A

Material Throughput

This record keeping sheet or something similar may be used to help show compliance with permit conditions PW001 and Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001.

Date:_____ **For month of:**_____

Monitoring Requirement	Total for calendar month	Consecutive 12-month total
Tons of Prime Aluminum Ingot Melted		
Tons of Chlorine Used		
Tons of Fluoride Used		
Million Cubic Feet of Natural Gas Burned		
Tons of Scrap Recycled		

Attachment B

Method 22 Visible Emissions Observations	
Installation Name	Observer Name
Location	Date
Sky Conditions	Wind Direction
Precipitation	Wind Speed
Time	Emission unit
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.	

Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment C

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

Attachment C (continued) Method 9 Opacity Observations

Minute	Seconds				1-minute Avg. % Opacity[5]	6-minute Avg. % Opacity[6]	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity)[7]								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
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29									
30									

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20 %. Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20 %, but less than 40 %.

Was the emission unit in compliance at the time of evaluation (yes or no)?

_____
Signature of Observer

[5] 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
[6] 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
[7] Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

Attachment D

Inspection/Maintenance/Repair/Malfunction Log

This sheet or something similar may be used to help show compliance with inspection, maintenance, repair and malfunction record keeping requirements in the permit.

Emission Unit # _____

Date/Time	Inspection/ Maintenance Activities	Malfunction Activities					
		Malfunction	Impact	Duration	Cause	Action	Initials

Attachment E

Bag Leak Detection System

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001.

Six-month reporting period		Emission Unit	Total Hours of Operation
Date Beginning	Date Ending		

Alarm		Corrective Action		Cause of the alarm and corrective actions taken
Date	Time	Time initiated	Time completed	

Attachment F

Flux Injection Log

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001.

Date: _____

Fluxing Agent	Composition	Weight

15-minute Block		Fluxing Agent(s)	Average Weight of Flux Injection	Total flux Injection rate	Within Compliance Parameters? (Yes/No)	Corrective Action Taken
Beginning Time	Ending Time					

Attachment G

Feed/Charge Log

This record keeping sheet or something similar may be used to help show compliance with permit condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001.

Operating Cycle or Time Period Used in Performance Test		Feed/Charge Weight (kg/Mg or lb/ton)
Begin (Date/Time)	End (Date/Time)	

Attachment H

Label Inspection Log

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001.

Date	Emission Unit	Unit Properly Labeled? (Yes/No)

Attachment I

Emission Calculations
(please specify units for all values)

This record keeping sheet or something similar may be used to help show compliance with permit condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011 through EU0090)-002.

Beginning of 24-hour period (Date/Time) _____

End of 24-hour period (Date/Time) _____

Emission Unit	Feed/Charge Weight
401 Holder (EU0002)	
404 Melter (EU0005)	
402 Holder (EU0006)	
403 Melter (EU0009)	
403 Holder (EU0010)	
401 Degasser (EU0003)	
402 Degasser (EU0007)	
403 Degasser (EU0011)	

PM Emission Rate (24 hour) _____

HCl Emission Rate (24 hour) _____

PM Emission Rate (3-day, 24-hour rolling avg.) _____

HCl Emission Rate (3-day, 24-hour rolling avg.) _____

PM Emission Rate Limit (3-day, 24-hour rolling avg.) _____

HCl Emission Rate Limit (3-day, 24-hour rolling avg.) _____

Attachment J

Rolling Lubricants

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0018) -001, (EU0020, EU0022, EU0024, EU0056, EU0058) - 001, (EU0060, EU0062, EU0064)-001.

For Month of _____Year_____

Rolling Lubricant (Name/Type)	Formulation (identify all oils and additives)	As-Received Boiling Point		As-Applied Boiling Point (initial)	As-Applied Temperature
		Initial	Final		

Attachment K

Purchase Records for Cold Cleaning Solvent

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0136) - 001.

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment L

Solvent Containing Waste Transfer Log

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0136) - 001.

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment M

Employee Solvent Metal Cleaning Training Log

This record keeping sheet or something similar may be used to help show compliance with Permit Condition (EU0136) - 001.

Date	Title of Solvent Metal Cleaning Training Course	Instructor

STATEMENT OF BASIS

Installation Description
JW Aluminum owns and operates a secondary aluminum installation that manufactures aluminum foil. The plant is located at 6100 South Broadway in St. Louis, Missouri, adjacent to the Mississippi River. Aluminum foil manufacturing facilities have a Standard Industrial Classification (SIC) number 3353 and a North America Industry Classification System (NAICS) number 331315. The Alumax facility in St. Louis that was owned by Alcoa, Inc. was sold to JW Aluminum in April, 2004. On May 17, 2004 the Air Pollution Control Program was informed that Alumax Foils, Inc. is no longer the installation owner at 6100 South Broadway and is now owned by JW Aluminum Company.

This installation is an integrated rolling facility capable of producing approximately 60 million pounds of finished aluminum foil products per year. The installation is a major source of particulate matter, volatile organic compounds, and hazardous air pollutants. JW is an affected facility under the 40 CFR Part 63, Subpart RRR, *National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production Plants.*

The facility recently completed a melter build, Construction Permit No. 092017-010, which drastically changed the melting process. The facility will no longer have/use 401 Melter. The facility built a new melter in place of the 402 Melter; now called 404 Melter. The capacity of 404 Melter is approximately 90,000 pounds and will be able to feed any two of the three holders. 403 Melter will still be in operation and essentially feeding 403 Holder only.

The Casting Department of the St. Louis facility consists of nine (9) sources within an existing Secondary Aluminum Processing Unit (SAPU) to which applicable particulate matter (PM) and hydrochloric acid (HCl) emission limits under the Secondary Aluminum NESHAP apply. These sources include two (2) melting furnaces, three (3) holding furnaces, and three (3) in-line degassing stations or in-line fluxers. The furnaces charge only prime aluminum or clean scrap, but use reactive flux. Therefore, they are classified as Group 1 Furnaces - Clean Charge Only. This classification is a modification from the previous versions of the operation, maintenance and monitoring (OM&M) plan, as JW Aluminum will no longer accept off-site scrap. Therefore, in accordance with §63.1505(i) of Subpart RRR, the SAPU is no longer subject to dioxin/furan emission limits. The two (2) rotary dross coolers that were subject to Secondary Aluminum MACT outside of the SAPU were removed in 2014 and a notification letter documented the source removal.

Raw Materials Processed or Used in Melting/Casting Operations:
The raw materials used in melting/casting operations by JW Aluminum include:
- Clean Charge (aluminum) as defined by 40 CFR 63.1503 (no coated or dirty scrap aluminum)
- Reactive Flux used to purify molten aluminum
  - Melting Furnaces – Solid salt flux comprising potassium fluorosilicate, potassium carbonate, and potassium nitrate
  - Holding Furnaces – Nitrogen/Chlorine mixture gaseous flux
  - In-line Fluxer/Degasser - Nitrogen/Chlorine mixture gaseous flux

Furnace and Baghouse Process Operation:
The main baghouse controls emissions from charge hoods and in-line fluxers. This baghouse has lime injection and inlet temperature monitoring. Also, emissions from the melting/holding furnaces are routed to the existing lime injected baghouse, but not during all times. An individual melter will be controlled only when the side door is open during the addition of flux and removal of dross. Emissions are captured using a hood. The gravity melt flow between the melter and holder is uncontrolled. An individual holder will be controlled only when flux is added and dross is removed. Emissions are captured using a different hood. All degassing emissions are controlled.

During charging of the melting furnaces, the emissions exit the building through the respective melter flue. Pollutants potentially emitted during charging primarily include particulate matter (PM) and any combustion products of natural gas that are not consumed by the recirculating furnace design. The interlocked flue air curtain does not operate when the charge door is open, and emissions are routed through the furnace flue. During charging, the side door on the melter remains closed. When charging is complete, the charge door is closed and emissions continue to be released through the flue.

Solid salt flux is added to the melting furnace through a side door. Emissions during this process include PM, HAPs (HCL & HF) and any combustion products of natural gas. When the melting furnace side door is opened the flue air curtain is activated, blocking flow through the flue. Instead of directing emissions through the flue, emissions generated from the process during this time are pulled to the lime-injected baghouse through the hood above the melter side door. Adding the flux takes approximately five minutes. The side door is then closed and emissions are again directed to the flue. This side door is re-opened approximately 15 minutes later to remove any dross on the surface of the molten aluminum. Emissions are directed to the baghouse in the same manner during the drossing. After drossing is completed (~20 minutes), the side door is closed and emissions are once again directed to the recirculating melter flue.

In the holding furnaces, the door must be opened to allow a gaseous mixture of nitrogen and chlorine to be manually added for fluxing through a wand handled by an employee. Drossing also occurs during this time, manually via fork truck, and the skimmings are collected in a dross box below the furnace door. This process takes approximately 30-40 minutes. Emissions during this process include PM, HAPs (HCl & HF) and combustion products of natural gas. When the holding furnace door is open emissions are directed to the central baghouse. When the door is closed emissions are directed to the holding furnace flue. During the manual fluxing of the holding furnaces, no solid salt flux is added to the melting furnaces.

Additional fluxing with the nitrogen/chlorine mixture occurs continuously in the degassers. Emissions during degassing are primarily hydrogen chloride. The flue for each degasser ties into the holding furnace baghouse ductwork downstream of the baffle that directs holding furnace emissions to either the baghouse or holder flue. Thus, all degasser emissions are directed to the lime-injected baghouse continuously.

Emissions from the melting and holding furnaces result from the combustion of natural gas by the burners heating the furnaces and from the melting of aluminum ingot and clean scrap aluminum. Hydrogen chloride and hydrogen fluoride emissions result from fluxing the melting furnaces with salt compounds and injecting the holding furnaces and degassers with chlorine gas. The melting and holding

furnaces and degassers have a common lime-injected baghouse for PM and HCl emissions control during fluxing operations.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

Pollutants	Potential Emissions[1]	Reported Emissions				
		2018	2017	2016	2015	2014
Particulate Matter ≤ Ten Microns (PM_{10})	4,018.90	31.88	43.54	37.67	32.76	34.49
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	2,300.81	31.45	43.03	37.22	31.07	32.21
Sulfur Oxides (SO_x)	1.32	0.45	0.47	0.51	0.78	0.78
Nitrogen Oxides (NO_x)	80.46	21.77	23.05	23.22	22.16	22.60
Volatile Organic Compounds (VOC)	3,176.26	247.89	239.39	240.76	220.94	232.74
Carbon Monoxide (CO)	34.48	13.31	14.09	14.15	12.85	12.54
Hazardous Air Pollutants (HAPs)	35.95	0.49	1.97	2.11	5.50	5.97

[1]Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Part 70 Operating Permit Application, received July 5, 2018;
2) 2018 Emissions Inventory Questionnaire, received April 30, 2019;
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4) City of St. Louis Air Pollution Control Division (APCD) Construction Permits:
   - Construction Permit No. 94-09-088 (Casting Line #403)- dated February 14, 1995.
   - Construction Permit No. 94-09-088 Condition Modification - dated October 17, 2001.
   - Construction Permit No. 94-09-088 Condition Modification - dated September 10, 2003.
   - Construction Permit for Two (2) Replacement Boilers - dated March 30, 1994.
   - Construction Permit No. 94-10-106 (Tip Oven)- dated January 23, 1995.
5) Air Pollution Control Program Construction Permit No. 092017-010.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
"None."

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

1) In the operating permit application the permittee requested a plant wide volatile organic compounds (VOCs) emissions limitation of 600 tons per year. This is based on Banking Emission Reduction Credits. 10 CSR 10-6.410, *Emission Banking and Trading*, provides a mechanism for companies to acquire offsets for economic development in accordance with §643.220, RSMO. An emission reduction credit created under 10 CSR 10-6.410 is a limited authorization to emit a criteria pollutant or its precursor in accordance with the provisions of this rule. This rule does not set limit on emissions; it provides mechanisms to banking and trading of emission. Therefore, this request is not included as a permit condition in this permit.

2) 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating.*
This regulation does not apply to the installation. 10 CSR 10-6.405(1)(E) exempts installations which exclusively combust natural gas and fuel oils #2 through #6.

3) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage Loading and Transfer.*
The rule is intended to restrict volatile organic compound emissions from the handling of petroleum liquids. JW Aluminum is exempt from this rule since none of the tanks on-site store a petroleum liquid as defined in 10 CSR 10-6.020 (2) Definitions.

4) 10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage.*
The provisions of this rule shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of one-half pound per square inch (0.5 psia) or greater in any stationary tank, reservoir or other container of forty thousand (40,000) gallon capacity or greater.

   This rule is not applicable because JW Aluminum does not store volatile organic liquid in tanks equal to or greater than 40,000 gallons in capacity.

5) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.*
This regulation does not apply to the installation. 10 CSR 10-6.405(1)(E) exempts installations which exclusively combust natural gas.

Construction Permit History
1) City of St. Louis Construction Permit #94-09-088.
Section V originally required records to be retained for a minimum of two years. This requirement has been changed in the Title V permit to five years in order to meet the requirements in paragraph (6)(C)1.C.(II)(b)I of 10 CSR 10-6.065, Operating Permits.

   Section III specifies annual production limits. The term "annual" was changed to "consecutive 12-month period" in the Title V permit.

   Section IV, Condition B of the permit states:
"The concentration of particulate matter shall not exceed 0.02 grains per standard cubic foot of

exhaust gas." The intent of the permit was to place this limit on the baghouse exhaust stack, to clarify this point the condition has been changed in the Title V permit to the following: "The concentration of particulate matter in the baghouse exhaust gas shall not exceed 0.02 grains per standard cubic foot of exhaust gas."

Section IV, Condition F of the permit was removed by a condition modification dated September 10, 2003. The condition stated: "Only aluminum scrap generated from the manufacture of aluminum foil at Alumax Foils facilities shall be recycled or remelted." The purpose of Condition F was to regulate the scrap metal quality, and was placed on the installation prior to the promulgation of the Secondary Aluminum MACT. Since the MACT now adequately addresses this issue, Condition F was omitted from permit 94-09-088 by the City of St. Louis Air Pollution Control Program.

Section V of the permit requires the permittee to keep records of pressure drop and material throughput, however no pressure drop requirements, i.e. pressure differential measurements in inches of water are established by the permit. For the control device operation to meet the requirements under 40 CFR Part 63, Subpart RRR, the continuous feed system is inspected at least once per 8-hour period as required by Monitoring 7(c) of Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU0010, and EU0011)-001. Additionally, the installation utilizes a bag leak detection alarm system to ensure compliance with Subpart RRR requirements, to ensure proper operation of the control device. Therefore, these conditions are not incorporated into this permit.

Section V of this permit also requires the permittee to keep records of scrap recycle in tons per month. JW Aluminum does not accept scrap and uses only clean charge. This condition is modified to state "internal run-around" as opposed to "scrap recycle."

2) City of St. Louis Construction Permit dated March, 30, 1994.
This permit is for Boiler #2 and Boiler #3. The boilers permit required the permittee to keep records of hours of operation and natural gas consumption. Since the boilers are out of service, the permit conditions of this permit are not incorporated in the P70 Operating Permit.

3) Construction Permit # 092017-010.
This permit was issued for modification of 402 Melter. The permit requires the permittee to test for PM_{10} and $PM_{2.5}$. The performance test has been completed as required; therefore, the conditions of this construction permit are not incorporated in the P70 Operating Permit.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations.*

The installation is potentially subject to several NSPS rules. Below is a summary of the potentially applicable subparts and the facilities applicability and compliance status to those subparts.

1) 40 CFR Part 60 - Subpart A, *General Provisions.*
The installation becomes subject to Subpart A - General Provisions upon becoming subject to an NSPS standard. If the installation is subject to various NSPS Standards; therefore, they are also subject to Subpart A.

2) 40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.*
Subpart Kb applies to vessels with a capacity of 75 cubic meters (19,800 gallons) or greater. For vessels with a capacity of between 75 cubic meters and 151 cubic meters, the subpart applies to tanks storing volatile organic liquid (VOL) with true vapor pressure greater than 15.0 kilopascals (kPA).
   - Three (3) 14,000-gallon rolling oil storage tanks registered with the City of St. Louis Air Pollution Control Program on 05/26/1989, 6,000-gallon storage tank registered with the City of St. Louis Air Pollution Control Program on 05/26/1989 (originally permitted for storage of Methanol, now stores Conosol rolling lubricant), and a 500-gallon Diesel #2 storage tank used to fuel the forklifts.

     The capacity of each of these 5 vessels is less than 19,800 gallons, therefore Subpart Kb does not apply.

   - Three (3) 20,000-gallon rolling oil storage tanks registered with the City of St. Louis Air Pollution Control Program on 05/26/1989. The true vapor pressure of the oil stored in the 3 vessels is less than 15.0 kPa, therefore subpart Kb does not apply.

3) NSPS Applicability Summary
The installation is not subject to NSPS Standards:

Maximum Achievable Control Technology (MACT) Applicability
10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations.*
The installation is potentially subject to several MACT rules. Below is a summary of the potentially applicable subparts and the facilities applicability and compliance status to those subparts.

1) 40 CFR Part 63, Subpart RRR, *National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production.*

   This regulation applies to the installation. Sections 63.1505(k)(1), (2) and (3) specify equations used to calculate emission limitations.

   The melting and holding furnaces use partial control to comply with the standard. In these furnaces, drossing and chlorination are performed on an 8-hour cycle. This work is done through the furnace side doors, or drossing doors. The hoods at the furnace dross doors are intended to ensure capture and control of furnace emissions during gaseous flux injection and drossing operations. The baghouse controls the exhaust from these hoods. The rest of the time furnace emissions are routed directly to the atmosphere.

   As required by 40 CFR Part 63, Subpart RRR and Construction Permit No. 092017-010, emission testing for hydrogen chloride, hydrogen fluoride, particulate matter, PM_{10}, $PM_{2.5}$, and CPM was conducted in March 6 – 8, 2018 at the baghouse outlet, the 403 and 404 melters, 401, 402 and 403 holders melter stack during the entire operating cycle.

Emission factors obtained from the test are used in the site-specific equations to show compliance with the emission limitations. Operating parameters, monitoring and record keeping requirements are included for group 1 furnaces with and without add-on air pollution control devices, since both situations apply to the installation.

§63.1505(i)(4) gives the installation the option of complying with an HCl concentration limit based on feed/charge or a control efficiency reduction limit. The installation has chosen to comply with the HCl concentration limit, therefore the performance testing and monitoring requirements reflecting the control efficiency requirements were not included in the operating permit

Subpart RRR contains several provisions for emissions controlled by a lime-injected fabric filter. The emission control device utilizes a true lime injected pre-coat system. Therefore, provisions for lime-injection are included in the Title V permit. The following sections concerning lime injection are included:

- §1506(m)(1), §1506(m)(3) and §1506(m)(5). These sections detail operating requirements for group 1 furnaces with emissions controlled by a lime-injected fabric filter. §1506(m)(2) was not included because the permittee chose the use of a bag leak detection system instead of a continuous opacity monitoring system (COMS). §1506(m)(6) was not included because the permittee does not operate a sidewall furnace.
- §1510(h)(1), §1510(h)(2), §1510(i)(1), (2), (3) and (4). These sections detail monitoring requirements for group 1 furnaces with emissions controlled by a lime-injected fabric filter. §1510(i)(3) and is not included because it relates to intermittent injection and the installation uses continuous injection.
- §1512(d) and §1512(n). These sections detail performance testing requirements for group 1 furnaces with emissions controlled by a lime-injected fabric filter.
- §1517(b)(3) and §1517(b)(4). These sections list record keeping requirements for group 1 furnaces with emissions controlled by a lime-injected fabric filter.

The permittee chose the use of a bag leak detection system instead of a continuous opacity monitoring system (COMS) to monitor proper baghouse operation (as required by §63.1510(f)).

The permittee submitted a revised Operation, Monitoring & Maintenance (OM&M) Plan as required by §63.1510(b) on October 4, 2019. The plan is the 7th revision to the original plan.

2) 40 CFR Part 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.*
The Subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

Subpart DDDDD applies to annealing and tip ovens.

3) 40 CFR Part 63, Subpart JJJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.*
This subpart applies to boilers at area source facilities that burn coal, oil, biomass, or non-waste materials. Boilers burning natural gas as defined in this regulation would not be affected by the subpart.

   This regulation does not apply because JW Aluminum is a major source of hazardous air pollutants (HAPS).

4) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning.*
This rule applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent, are not covered under this rule.

   This regulation does not apply to the parts washers (EU0136) because they use stoddard solvent (CAS # 8052-41-3). Stoddard solvent is a petroleum distillate fraction containing C7-C12 hydrocarbons. It consists primarily of straight-chain and branched-chain alkanes and cycloalkanes and may contain up to 20% aromatic hydrocarbons. It does not contain any of the halogenated compounds listed in §63.460(a).

5) 40 CFR Part 63, Subpart Q, *National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers*
The provisions of this subpart apply to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994, and are either major sources or are integral parts of facilities that are major sources as defined in 40 CFR 63.401.

   The process cooling towers located at this installation do not use chromium-based water treatment chemicals. Therefore, this rule does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos.*
The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:

- Demolition and Renovation - 40 CFR 61.145
- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying - 40 CFR 61.150

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 emissions were not included within this permit. The applicant is required to report the data directly to EPA. The public may obtain CO_2 emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations

1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds.*
   10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions.*
   - 10 CSR 10-6.261 applies to all sources that emit SO_2. According to the exception in 10 CSR 10-6.261(1)(A), the permittee is required to comply with the record keeping requirement in 10 CSR 10-6.261(4) for SO_2 emitting sources combusting natural gas to determine the exception.
   - 10 CSR 10-6.261 and 10 CSR 10-6.260 apply to Melting Furnace (EU0009), when combusting used oil as alternate fuel.
   - 10 CSR 10-6.260 does not apply to sources combusting natural gas according to 10 CSR 10-6.260(1)(A)(2).

   10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in the State Implementation Plan and thus are federally enforceable. The provisions of 10 CSR 10-6.260 will expire and the provisions of 10 CSR 10-6.261 will become federally enforceable once 10 CSR 10-6.261 is incorporated into the federally-approved SIP as a final EPA action.

2) 10 CSR 10-5.451, *Control of Emissions from Aluminum Foil Rolling.*
   - Paragraphs (4)(A)5 and (4)(B)5 require records to be retained for at least three years. This requirement has been changed in the Title V permit to five years in order to meet the requirements in paragraph (6)(C)1.C.(II)(b)I of 10 CSR 10-6.065, *Operating Permits.*
   - Section (3)(B) of this rule places requirements on emission sources that have ever had actual VOC emissions equal to or greater than 1000 tons per calendar year. None of the mills have a recorded VOC actual emissions greater than 1000 tons per calendar year. Therefore this section does not apply.

3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes.*
   10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed. The emission units to which this rule

potentially applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit presented below were calculated based on sources Maximum Design Rate (MDR). If the emissions from these emission units can not violate the limits of this rule then evidence of this is demonstrated in the following calculations.

One of the following equations from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour, and

$E = 55.0P^{0.11} - 40$ for process weight rates greater than 30 tons (60,000 lbs) per hour

Where: E = rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

a) At maximum design rates, the uncontrolled potential PM emission rates for the units listed in the table below based on AP-42 factors are less than the allowed exemption level of 10 CSR 10-6.400(1)(B)11. (i.e., 0.5 lbs/hr), therefore these units are not subject to the provisions of this rule. Emission factors used are from Stack Test Results reported in 2018 EIQ.

		PM Emission Factor (EF)		PM Emission		
Emission Unit	Max. Design Rate (ton/hr)	With Control (lb/ton)	Without Control (lb/ton)	Without Control (lb/hr)	With Control (lb/hr)	Limit (lb/hr)
EU0002	3.7	—	0.00045	0.0017	—	9.85
EU0003	3.7	—	0.00045	0.0017	—	9.85
EU0005	5.0	—	0.00657	0.33	—	12.05
EU0006	2.40	—	0.0011	0.0027	—	7.37
EU0007	2.40	—	0.0011	0.0027	—	7.37
EU0010	3.7	—	0.00042	0.0016	—	9.85
EU0011	3.7	—	0.00042	0.0016	—	9.85
EU0056	2.0	—	0.05817	0.12		6.52
EU0058	2.0	—	0.1023	0.21		6.52
EU0060	2.0	—	0.2256	0.45		6.52
EU0062	1.1	—	0.2251	0.25		4.37
EU0064	2.0		0.1393	0.28		6.52

b) At maximum design rates, the uncontrolled potential PM emission rates for the units listed in the table below based on Stack Test Results reported in 2018 EIQ are less than their corresponding allowable PM emission limits. No monitoring, record keeping or reporting is required.

		PM Emission Factor (EF)		PM Emission		
Emission Unit	Max. Design Rate (ton/hr)	With Control (lb/ton)	Without Control (lb/ton)	Without Control (lb/hr)	With Control (lb/hr)	Limit (lb/hr)
EU0009	3.7	—	0.1822	0.67	—	9.85
EU0018	20.0	—	0.133547	2.67	—	30.51
EU0020	4.8	—	0.1661	0.79	—	11.73
EU0022	7.0	—	0.8002	5.60	—	15.10
EU0024	3.2	—	0.4642	1.49	—	8.94

c) According to 10 CSR 10-6.400(1)(B)7., the following fugitive sources are not subject to this rule.

Emission Unit No.	Description of Emission Unit
EU0004	401 Caster
EU0008	402 Caster
EU0012	403 Caster
EU0046G	Aluminum Scrap Balers
EU0118	Wood Shop
EU0135	Process Cooling Towers

4) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit for the following emission units:

Emission Unit	Description	10 CSR 10-6.220 Applicability
• Annealing Ovens • Tip Ovens • Miscellaneous Natural Gas-Fired Space Heaters	Facility-Wide natural gas-fired combustion equipment	These sources are not subject to this regulation (10 CSR 10-6.220(1)(L). Any emission units burning only natural gas are exempt from the requirements of this rule.
401, 402 and 403 Casters	Molten Aluminum Casters – Fugitive Sources.	10 CSR 10-6.220(1)(K) exempts fugitive emission sources regulated under 10 CSR 10-6.170.stationary internal combustion engines operated in the St. Louis metropolitan area.
Cooling Towers	Process Cooling Towers	The regulation is applicable to the cooling towers, but was not applied within this permit. The cooling towers during normal operation emit little or no visible emissions. The cooling towers can emit large amounts of water vapor which make it difficult to determine if/how much visible contaminant is being emitted. The Air Pollution Control Program is not requiring any monitoring, record keeping, or reporting for the cooling towers at this time; but, should visible emissions become an issue, these requirements may be added in the future.

5) Emission Units Without Limitations:
The following emission units listed as units without limitations are not subject to any specific rule:

- Chlorine Room:
  This room contains pressurized cylinders of chlorine gas for use in the fluxing operations. When in use the cylinders are connected to lines that feed the gas out to the necessary units. Minimal fugitive chlorine emissions result from this process. Currently there are no regulations that apply to these units, therefore they are classified as emission units without limitations.

- Aluminum Scrap Balers:
  These units pack scrap aluminum into bales for reuse. Only fugitive particulate emissions can result from this process, therefore the units are classified as emission units without limitations.

- Wood Shop:
  The wood shop contains equipment for the construction of wooden crates. Only fugitive particulate emissions can result from this process, therefore the units are classified as emission units without limitations.

- Six (6) Rolling Oil Storage Tanks:
  Currently there are no regulations that apply to these units, therefore they are classified as emission units without limitations

- Oil Stills:
  These units are electric and are used to purify recycled rolling oil. Currently there are no regulations that apply to these units, therefore they are classified as emission units without limitations.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft P70 Operating Permit, Project 2018-07-027, for JW Aluminum (510-0118) was placed on public notice as of August 30, 2019, for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: http://dnr.mo.gov/env/apcp/permit-public-notices.htm. On September 27, 2019, the Air Pollution Control Program received comments from the United States Environmental Protection Agency, Region 7 (EPA).

Comment #1: Permit Condition (EU0002, EU0003, EU0005, EU0006, EU0007, EU0009, EU00l0, and EU00ll)-001 requires the permittee to prepare and implement a written operation, maintenance, and monitoring (OM&M) plan, as required by §63.1510(b). The Revised OM&M Plan, MoDNR provided to EPA for review during this public notice review of the JW Aluminum Part 70 operating permit, is dated September 2009. EPA is concerned that the current September 2009 OM&M Plan could be substantially outdated. On September 26, 2017, JW Aluminum was issued Permit to Construct #092017-()10 authorizing modifications to the 402 melter to increase capacity from 40,000 to 100,000 pounds; increase natural gas input from 18 to 30 MMBtu/hr; and increase short term melting rate from 2.5 to 6.1 tons per hour. Additionally, the OM&M Plan provided for review references emission rates based on an August 2007 performance test; yet §63.1511(e) requires the permittee to conduct a performance test every five (5) years. Therefore, EPA encourages MoDNR consider the need to update and approve a revision to the OM&M Plan which more accurately reflects existing operations and latest performance test emission rates.

Response to Comment: *JW Aluminum submitted a revised Operation, Monitoring & Maintenance (OM&M) Plan as required by §63.1510(b) on October 4, 2019. The plan is the seventh revision.*