

PUBLIC NOTICE

Arconic Tennessee LLC has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The applicant is **Arconic Tennessee LLC** with a site address of 2300 North Wright Road. They have applied for renewal of their existing major source (Title V) operating permit for their aluminum production operation.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

Knoxville Environmental Field Office 3711 Middlebrook Pike Knoxville, TN 37921	and	Tennessee Department of Environment and Conservation Division of Air Pollution Control William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, TN 37243
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Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<http://www.tn.gov/environment/topic/ppo-air>

Questions concerning the source(s) may be addressed to Tawanna F. Reid at (865) 594-5459 or by e-mail at tawanna.reid@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on **October 23, 2020**. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 22nd Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243



OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: draft

Permit Number:

Date Expires: draft

576488

Issued To:

Arconic Tennessee LLC

Installation Address:

2300 North Wright Road
Alcoa, Tennessee

Installation Description:

**North Plant Fabrication, Support,
& Remediation**

Source 105 – Continuous Cold Mill

Source 106 – Hot Line

Source 108 – Preheat Furnaces 61-87 and
Pusher Preheats 1-2

Source 109 – Annealing Furnaces

Source 113 – Al Ingot Scalping Operation

Source 100 – Automotive Sheet Line

Source 125 – Wastewater Treatment Plant
Boiler

Facility ID: 05-0008

Renewal Application Due Date:

Between **draft** and **draft**

Primary SIC: 33

Information Relied Upon:

Administrative Amendment dated July 22, 2020

Minor Modification Application dated July 19, 2019

Renewal Application Addendum dated March 6, 2019

Minor Modification Application dated March 6, 2019

Renewal Application dated February 28, 2019

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.
3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM₁₀ shall not be placed in either the regulated HAP category or miscellaneous HAP category.
4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM₁₀, sulfur dioxide (SO₂), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
6. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or
2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12. Permit renewal and expiration.

(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.

(b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
2. Additional requirements become applicable to an affected source under the acid rain program.
3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the

Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

- (a) 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:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.
- (b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- (c) 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.

- A20. 112 (r).** Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

**GENERAL CONDITIONS for MONITORING,
REPORTING, and ENFORCEMENT**

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

- (a) Where applicable, records of required monitoring information include the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
 2. The date(s) analyses were performed;
 3. The company or entity that performed the analysis;
 4. The analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less

than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303
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TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

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

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than 24 hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

- B9. Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

- B10.** Reserved.

- B11. Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit within 20 days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same 20 day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the 20 day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
 - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of seven days in advance of the proposed changes. The Technical Secretary may waive the seven day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

- C4. Minor permit modifications.**
- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).
 - (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
 - (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
 - (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of 20 percent for an aggregate of more than five minutes in any one hour or more than 20 minutes in any 24 hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20 percent (6-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

- D7. Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12. Standards of Performance for New Stationary Sources. When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13. Gasoline Dispensing Facilities. When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. Internal Combustion Engines.

- (a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.
- (b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.
- (c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

05-0008	<u>Facility Description:</u>	North Plant – Fabrication: Operations include scalper, preheat furnaces, hotline, annealing furnaces, continuous cold mill, and automotive sheet line. North Plant – Support and Remediation, Including Emergency Fire Water Pump Engine (Insignificant Activity) and Wastewater Treatment Plant Boiler
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Conditions E1 through E3-9 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 05-0008

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	558.39	AEAR	Includes all fee emissions.
PM₁₀	11.83	AEAR	Includes all fee emissions.
SO₂	5.46	AEAR	Includes all fee emissions.
VOC	N/A	N/A	VOC allowable is included in the PAL permit
NO_x	163.70	AEAR	Includes all fee emissions.
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD)*			
VOC FAMILY GROUP		N/A	
NON-VOC GASEOUS GROUP		N/A	
PM FAMILY GROUP		N/A	
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD)**			
VOC FAMILY GROUP		N/A	
NON-VOC GASEOUS GROUP		N/A	
PM FAMILY GROUP		N/A	
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE		N/A	

NOTES

AAP The **Annual Accounting Period (AAP)** is a 12 consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **Annual Accounting Period** at the time of this permit renewal issuance **began January 1, 2020 and ends December 31, 2020.** The next Annual Accounting Period **begins January 1, 2021 and ends December 31, 2021,** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection Form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website (Attachment 5).

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **Actual Emissions Analysis is Required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family),
- (3) the **Miscellaneous HAP Category**,
- (4) the **Specific HAP Category**, and
- (5) the **NSPS Category**

under consideration during the **Annual Accounting Period**.

- * **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.
- ** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation**, each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.
- *** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the **PM, SO₂, VOC or NO_x** emissions from each source in this permit. **For fee computation**, each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
 - (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
 - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and

- (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

Payment of Fee to:

The Tennessee Department of Environment and Conservation
 Division of Fiscal Services
 Consolidated Fee Section – APC
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 10th Floor
 Nashville, Tennessee 37243

Actual Emissions Analyses to:

The Tennessee Department of Environment and Conservation
 Division of Air Pollution Control
 Emission Inventory Program
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis can also be submitted to: apc.inventory@tn.gov

E2. Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** through **June 30** and **July 1** through **December 31** and shall be submitted within 60 days after the end of each six-month period. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
Old permit #568089	1 st day of SAR period (with year)	day before new permit issuance (with year)
New permit #576488	Issuance Date of new permit (with year)	end of SAR period (with year)

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions **E4-2, E4-7, E5-1, E5-7, E6-1, E9-2, E16-1 and E16-2** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from condition **E3-1** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS.**

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

- (b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **July 1** to **June 30** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
Old permit #568089	1 st day of ACC period (with year)	day before new permit issuance (with year)
New permit #576488	Issuance Date of new permit (with year)	end of ACC period (with year)

These certifications shall be submitted to: **TN APCD** and **EPA**

<p>Division of Air Pollution Control Knoxville Environmental Field Office 3711 Middlebrook Pike Knoxville, TN 37921 or Email Address APC.KnoxEFO@tn.gov</p>	<p>and</p>	<p>Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303</p>
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40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.79, No. 144, July 28, 2014, pages 43661 through 43667
 TAPCR 1200-03-09-.02(11)(e)3.(v)

- (c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or Technical Secretary’s representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

- (d) **NESHAP Reports** You must submit all reports required by Table 9 of 40 CFR part 63 subpart DDDDD electronically to the EPA via the CEDRI as described in **Condition E18-8**.

TAPCR 1200-03-09-.03(8)

E3. General Permit Requirements.

- E3-1.** Visible emissions from all stacks related to this permit shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period and for no more than four six-minute periods in any 24 hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1. If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

- E3-2.** Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.

TAPCR 1200-03-09-.03(8)

- E3-3.** Logs and records specified in this permit shall be made available upon request by the Technical Secretary or representative and shall be retained for a period of not less than five years unless otherwise noted. The logs contained in this permit are based on a recommended format. Any logs that have an alternative format may be utilized provided they contain the same information that is required. Computer-generated logs are also acceptable.

TAPCR 1200-03-09-.03(8) and 1200-03-10-.02(2)(a)

- E3-4.** The source(s) controlled by the air pollution control device(s) shall not operate unless the control device(s) is in operation. In the event a malfunction/failure of a control device(s) occurs, the operation of the process(es) controlled by the control device(s) shall be regulated by the provisions of Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.

TAPCR 1200-03-09-.03(8)

- E3-5.** Record keeping requirements for this facility, including all data and calculations, must be updated and maintained based on the following schedule:

<u>Record Keeping Type</u>	<u>Update Requirement</u>
Monthly Log	Recorded within 30 days after the end of the month
Weekly Log	Recorded within seven days after the end of the week
Daily Log	Recorded within seven days after the end of the day

TAPCR 1200-03-10-.02(2)(a)

- E3-6.** The permittee listed various insignificant and exempt activities in their Title V Application per Rule 1200-03-09-.04(5). Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 application form along with a truth, accuracy, and completeness statement signed by a responsible official.

TAPCR 1200-03-09-.03(8)

- E3-7.** Due allowance for failure to monitor shall be made during any period of monitoring system malfunction, provided that the source owner or operator shows, to the satisfaction of the Technical Secretary, that the malfunction was unavoidable and is being repaired as expeditiously as practicable and that a log of all such malfunctions is being kept by the permittee, including time malfunction began, when it was detected, what was wrong, what was done to correct the malfunction, and when the malfunction was corrected.

TAPCR 1200-03-10-.02(1)(e)

- E3-8.** Identification of Responsible Official, Technical Contact, and Billing Contact

- (a) The applications that were utilized in the preparation of this permit are dated February 28, 2019, and March 6, 2019, and signed by Responsible Official, Jeffrey C. Weida of the permitted facility. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

- (b) The application that was utilized in the preparation of this permit is dated February 28, 2019, and identifies Caitlin Newman (see Administrative Amendment dated July 22, 2020 for notification of name change) as the Principal Technical Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated February 28, 2019, and identifies Caitlin Newman (see Administrative Amendment dated July 22, 2020 for notification of name change) as the Billing Contact for the permitted facility. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09-.03(8)

- E3-9.** This source(s) shall comply with all applicable state and federal air pollution regulations. This includes, but is not limited to, all applicable provisions of the Tennessee Air Pollution Control Regulations, federal regulations published under 40 CFR 61 and 40 CFR 63 for sources of hazardous air pollutants, and federal regulations published under 40 CFR 60, New Source Performance Standards.

TAPCR 1200-03-09-.03(8)

- E3-10.** This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition E3-8**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.03(8)

E4 Emission Source

05-0008-105	Source Identification:	Continuous Cold Mill: The continuous three stand cold mill process receives cooled aluminum coils either from the hotline or the annealing furnaces and rolls the coils to final product thickness specifications. Make-up oil is used in the rolling process. The emission source includes an accumulator and coolant system.
	Stacks:	TNMILL0417_EP (two identical busch stacks) TNMILL0420_EP (Miebach welder)
	Control Equipment:	Horizontal cyclonic separator (TNMILL0417_EP) Second horizontal cyclonic separator (TNMILL0417_EP) Cyclone/wet collector (TNMILL0420_EP)
	Process Heater:	Low NOx process heater rated at 11.75 million Btus per hour (NSPS subpart Dc, NESHAP 63 subpart DDDDD)

Conditions E4-1 through E4-11 apply to source 05-0008-105

- E4-1.** The process material input rate for this source (continuous cold mill) is **300,000** pounds per hour (lb/hr) of aluminum. Should the permittee need to modify this source in a manner that increases the material input rate a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.
TAPCR 1200-03-09-.03(8)
Compliance Method: The permittee shall certify compliance annually with this condition in the annual compliance certification required by **Condition E2(b)** of this permit.
- E4-2.** Particulate matter (PM) emitted from this source shall not exceed **19.57** pounds per hour on a 24-hour average basis and **0.25** grains per dry standard cubic foot.
TAPCR 1200-03-07-.04(2)
Compliance Method (Continuous Cold Mill) : Compliance with the hourly emission limitation shall be assured through periodic monitoring and inspection of pollution control equipment. This process shall not operate without the use of at least one of the two horizontal cyclonic separators to collect and control PM emissions. Records of inspections and any maintenance activity shall be kept for a period of five years.
The compliance assurance monitoring (CAM) plan is in Attachment 2
Compliance Method (Welder): The control equipment shall be maintained, kept in good operating condition, and inspected semiannually to ensure compliance with the applicable PM emission limits. Documentation of the semiannual inspections and any maintenance performed shall be kept on site for a period of not less than five years. A summary of these records shall be kept and reported in accordance with **Condition E2**.
- E4-3.** Volatile Organic Compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.
TAPCR 1200-03-07-.07(2) and 1200-03-09-.01(5)(b)10
- E4-4.** For fee purposes, the permittee shall calculate the actual emissions of Particulate Matter (PM) and Volatile Organic Compounds (VOC) for the current annual accounting period from the continuous cold mill. Actual emissions of Volatile Organic Compounds shall be calculated using the methods in PAL permit 967460.
Actual Particulate Matter emissions shall be calculated using the following procedures:
CCM (3 stand mill): Actual PM emissions equal 0.002 pounds of PM per ton of throughput.
Miebach Welder: Actual PM emissions equal the number of welds times the emission factor of 0.2 pounds of PM per weld.
The total actual PM emissions from this source are the sum of PM from the 3 stand mill and the Miebach welder.
The calculated emissions and supporting documentation shall be submitted as required by **Condition E1**.
TAPCR 1200-03-26-.02(9)

- E4-5.** The heat input design rate of the process heater is **11.75** Million British Thermal Units per hour (MMBtu/hr). Should the permittee need to modify this source in a manner that increases the heat input design rate a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8), Construction Permit 961507P

Compliance Method: The manufacturer specification documents shall be retained as proof of the heat input design rate for the process heater. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E4-6.** The process heater must be equipped with low nitrogen oxide (NOx) technology.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this requirement shall be assured by maintaining documentation from the manufacturer that clearly states the process heater is equipped with low NOx technology. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E4-7.** Natural gas shall be the only fuel combusted in the process heater. The process heater is only capable of burning this fuel. Should the permittee need to modify the process heater in a manner that changes the fuel type, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019, from the permittee.

Compliance Method: Compliance with this limitation shall be demonstrated by maintaining monthly records of natural gas usage pursuant to 40 CFR §60.48c(g)(2) and TAPCR 1200-03-09-.03(8), which shows compliance with 40 CFR part 60 subpart Dc.

- E4-8.** Particulate Matter (PM) emitted from the process heater shall not exceed **0.55** pounds per Million Btus (6.47 pounds per hour).

TAPCR 1200-03-06-.02(2)(a)

Compliance Method: Compliance with this emission limitation shall be assured by operating the process heater as designed and complying with **Conditions E4-5 and E4-7**.

- E4-9.** Sulfur Dioxide (SO₂) emitted from the process heater shall not exceed **0.01** pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3)

Compliance Method: Compliance with this emission limitation is based on the heat input design rate of the process heater, (**Condition E4-5**), burning natural gas only as fuel (**Condition E4-7**), and the emission factor of 0.6 lbs./10⁶ scf found in AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-2.

- E4-10.** The emission limitations for the process heater in Table 1 were established for fee purposes only. The permittee shall calculate the actual emissions of Nitrogen Oxides and Volatile Organic Compounds using the emission factors identified in Table 1, and AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Tables 1-4-1 & 1.4-2. The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.

TAPCR 1200-03-26-.02(9)

Table 1: Fee-Based Emission Limitations (TPY)

<u>Fee-Based Emission Limitations</u>			
Emission Factors (pounds of pollutant per fuel combusted)			
Pollutant	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Reference
Emission Limitations	2.52	0.28	Attachment 3
Natural Gas (per 1,000,000 cubic feet)	50	5.5	Attachment 4

E4-11. This source must comply with the applicable requirements of 40 CFR part 63, Subpart DDDDD, which are outlined in **Conditions E18-1 through E18-11** of this permit.

TAPCR 1200-03-09-.03(8)

E5. Emission Source

<p>05-0008-106</p>	<p>Source Identification: Hot Line: Aluminum ingots are rolled in this process producing aluminum sheets in coils. The emission source includes coolant systems and shears.</p> <p>Mills: 80” Mill 96” Mill 120” Mill</p> <p>Stacks: TNMILL0422_EP (two identical Busch stacks for the 80” mill) TNMILL0421_EP (two identical Busch stacks for the 120” mill) TNMILL0423_EP (two identical Busch stacks for the 96” mill)</p> <p>Control Equipment: Two horizontal cyclonic separator (TNMILL0422, 80” Mill) Two horizontal cyclonic separator (TNMILL0421, 120” Mill) Two horizontal cyclonic separator (TNMILL0423, 96” Mill)</p> <p>Process Heaters: 80” Mill, Low NOx process heater rated at 17.0 million Btus per hour (NSPS subpart Dc) 96” Mill, Low NOx process heater rated at 11.75 million Btus per hour (NSPS subpart Dc) 120” Mill, Low NOx process heater rated at 11.75 million Btus per hour (NSPS subpart Dc)</p>
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Conditions E5-1 through E5-11 apply to source 05-0008-106

E5-1. The material input rate for this source (hot rolling mills) shall not exceed **250** tons of aluminum ingot per hour, averaged over the daily total operating hours excluding down time. Should the permittee need to modify this source in a manner that increases the material input rate, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019

Compliance Method: The permittee shall demonstrate compliance with this limitation by keeping records of the daily amount of aluminum processed and the daily hours of operation at this source. A copy of these records shall be made readily available to the Technical Secretary if requested and reported in accordance with **Condition E2** of this permit. The records shall be maintained for a period of not less than five years. The records shall contain the following information:

- Aluminum Processed (tons per day)
- Daily Hours of Operation (hours per day)
- Aluminum Processed Daily Average (tons per hour), where:

$$\text{Aluminum Processed Daily Average} \left(\frac{\text{tons}}{\text{hr}} \right) = \frac{\text{Aluminum Processed} \left(\frac{\text{tons}}{\text{day}} \right)}{\text{Daily Hours of Operation} \frac{\text{hrs}}{\text{day}}}$$

E5-2. Particulate Matter (PM) emitted from this source shall not exceed **61.0** pounds per hour on a daily average basis.
TAPCR 1200-03-07-.02(4)

Compliance Method: Compliance with this emission limitation is based on compliance with **Condition E5-1**.

This source shall not operate without the use of at least one of the two horizontal cyclonic separators to collect and control particulate air contaminants created by the 80", 120" and 96" Mills. Routine inspections shall be performed semi-annually on all control devices. Appropriate maintenance records, including inspections and dates on which maintenance is performed, shall be recorded in a suitable permanent form and kept available for inspection. These records shall be retained for a period of not less than five years.

Compliance with CAM requirements will be met by continuously monitoring exhaust fan amperage. The updated compliance assurance monitoring (CAM) plan is included in Attachment 2.

E5-3. Volatile Organic Compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.

TAPCR 1200-03-07-.07(2) and 1200-03-09-.01(5)(b)10

Compliance Method: Compliance with this requirement shall be demonstrated by maintaining records of VOC emissions and including the result in PAL permit 967460.

E5-4. For fee purposes, the permittee shall calculate the actual emissions of Volatile Organic Compounds (VOC) and Particulate Matter (PM) for the current annual accounting period from the hot rolling mills. Actual emissions of VOC and PM shall be calculated based on the same parameters as noted in **Condition E5-1**.

Actual monthly VOC and PM emissions shall be calculated using the following emission factors along with the amount of aluminum processed. The total actual VOC and PM emissions for the accounting period from this source is the sum of the monthly VOC and PM emissions for all units.

The calculated emissions and supporting documentation shall be submitted as required by **Condition E1**.

This requirement is pursuant to TAPCR 1200-03-26-.02(9)

Actual Monthly Emissions of VOCs		
Month/Year:		
Unit	Emission Factor	VOC Emissions
Hotline – 120" mill	0.035 lb VOC / ton of aluminum	
Hotline – 120" oil house	0.03 lb VOC / ton of aluminum	
Hotline – 96" mill	0.096 lb VOC / ton of aluminum	
Hotline – 96" oil house	0.04 lb VOC / ton of aluminum	

Hotline – 80” mill	0.255 lb VOC / ton of aluminum	
Hotline – 80” oil house	0.04 lb VOC / ton of aluminum	

Actual Monthly Emissions of PM		
Month/Year:		
Unit	Emission Factor	PM Emissions
Hotline – 120” mill	0.018 lb PM/ton of aluminum processed	
Hotline – 96” mill	0.018 lb PM/ton of aluminum processed	
Hotline – 80” mill	0.065 lb PM/ton of aluminum processed	

- E5-5.** The heat input design rate of the process heaters is **11.75** Million British Thermal Units per hour (MMBtu/hr) for the 120” mill, **11.75** Million British Thermal Units per hour (MMBtu/hr.) for the 96” mill, and **17.0** Million British Thermal Units per hour (MMBtu/hr.) for the 80” mill. Should the permittee need to modify this source in a manner that increases the heat input design rate a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09, Construction Permit 961507P

Compliance Method: The manufacturer specification documents shall be retained as proof of the heat input design rate for the process heaters. This document shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E5-6.** The process heaters must be equipped with low nitrogen oxide (NO_x) technology.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this requirement shall be assured by maintaining documentation from the manufacturer that clearly states the process heaters are equipped with low NO_x technology. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E5-7.** Natural gas shall be the only fuel combusted in the process heaters. The process heaters are only capable of burning this fuel. Should the permittee need to modify the process heaters in a manner that changes the fuel type used, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019, from the permittee.

Compliance Method: Compliance with this limitation shall be demonstrated by maintaining monthly records of natural gas usage pursuant to 40 CFR §60.48c(g)(2) and TAPCR 1200-03-09-.03(8), which shows compliance with 40 CFR part 60 subpart Dc. A copy of these records shall be made readily available to the Technical Secretary if requested and reported in accordance with **Condition E2** of this permit.

- E5-8.** Particulate Matter (PM) emitted from each of the **11.75** MMBtu/hr process heaters shall not exceed **0.55** pounds per million Btus (6.47 pounds per hour each). Particulate Matter (PM) emitted from the **17.0** MMBtu/hr. process heater shall not exceed **0.45** pounds per million Btus (7.65 pounds per hour).

TAPCR 1200-03-06-.02(2)(a)

Compliance Method: Compliance with this emission limitation shall be assured by operating the process heater as designed and complying with **Conditions E5-5 and E5-7**.

- E5-9.** Total Sulfur Dioxide (SO₂) emitted from the process heaters shall not exceed **0.02** pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3)

Compliance Method: Compliance with this emission limitation is based on the heat input design rate of the process heaters (**Condition E5-5**), burning natural gas only as fuel (**Condition E5-7**), and the emission factor of 0.6 lbs./10⁶ scf found in AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-2.

E5-10. The emission limitations for the process heaters in Table 1 were established for fee purposes only. The permittee shall calculate the actual emissions of Nitrogen Oxides and Volatile Organic Compounds using the emission factors identified in Table 1, and *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Tables 1-4-1 & 1.4-2. The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.
TAPCR 1200-03-26-.02(9)

Table 1: Fee-Based Emission Limitations (TPY)

Fee-Based Emission Limitations			
Emission Factors			
(pounds of pollutant per fuel combusted)			
Pollutant	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Reference
Emission Limitations	8.70	0.96	
Natural Gas (per 1,000,000 cubic feet)	50	5.5	Attachment 3 Attachment 4

E5-11. This source must comply with the applicable requirements of 40 CFR part 63, Subpart DDDDD which are outlined in **Conditions E18-1 through E18-11** of this permit.
TAPCR 1200-03-09-.03(8)

E6. Emission Source

05-0008-108 Source Identification: North Plant –Preheat Furnaces (No. 61-87) bring the aluminum ingots to the proper temperature and process characteristics for further processing at the hot line. The furnaces are natural gas fired. There are a total of 27 preheat furnaces. This source also consists of two Pusher Preheat Furnaces (No. 1 and 2) that are direct-fired.

Conditions E6-1 through E6-8 apply to source 05-0008-108

E6-1. The maximum total amount of natural gas used by the preheat furnaces shall not exceed **2,536.02** Million standard cubic feet (MMscf) of natural gas based on a 12-month rolling total. Should the permittee need to modify this source in a manner that increases the amount of natural gas used, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

This fuel limitation is established pursuant to TAPCR 1200-03-09-.01(4) and the statement in the application dated November 28, 2007. The permittee requested this limit in order to avoid a PSD review due to a modification.

Compliance Method: Compliance with this limitation shall be demonstrated by maintaining records of natural gas usage on a monthly basis and on a 12-month rolling total. All data, including all required calculations, must be recorded no later than 30 days from the end of the month for which the data is required. A copy of these records shall be made readily available to the Technical Secretary if requested and reported in accordance with **Condition E2** of this permit. These records must be retained for a period of not less than five years.

E6-2. Only natural gas shall be used as fuel for the preheat furnaces. The preheat furnaces are only capable of burning this type of fuel. Should the permittee need to modify the preheat furnaces in a manner that changes the fuel type, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019, from the permittee.

Compliance Method: Compliance with this limitation shall be demonstrated by maintaining the records required in **Condition E6-1** of this permit

- E6-3.** Particulate Matter (PM) emitted from the preheat furnaces shall not exceed **2.20** pounds per hour on a daily average basis.

TAPCR 1200-03-06-.01(7)

Compliance Method: Compliance with this emission limitation is based on the total amount of natural gas used (**Condition E6-1**), burning natural gas only as fuel (**Condition E6-2**), and the emission factor of 7.6 lbs./10⁶ scf found in AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-2.

- E6-4.** Sulfur Dioxide (SO₂) emitted from the preheat furnaces shall not exceed **0.17** pounds per hour on a daily average basis.

TAPCR 1200-03-14-.01(3)

Compliance Method: Compliance with this emission limitation is based on the total amount of natural gas used (**Condition E6-1**), burning natural gas only as fuel (**Condition E6-2**), and the emission factor of 0.6 lbs./10⁶ scf found in AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-2.

- E6-5.** Volatile organic compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.

TAPCR 1200-03-07-.07(2) and 1200-03-09-.01(5)(b)10

Compliance Method: Compliance with this requirement shall be demonstrated by maintaining records of VOC emissions and including the result in PAL permit 967460.

- E6-6.** New preheat furnaces must be equipped with low nitrogen oxide (NO_x) technology.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this requirement shall be assured by maintaining documentation from the manufacturer that clearly states the preheat furnaces are equipped with low NO_x technology. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E6-7.** The emission limitations for the preheat furnaces in Table 1 were established for fee purposes only. The permittee shall calculate the actual emissions of Nitrogen Oxides and Volatile Organic Compounds using the emission factors identified in Table 1, and AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Tables 1-4-1 & 1.4-2. The emission factors are to be used with the actual amount of fuel combusted as documented in **Condition E6-1** for the current annual accounting period. The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.

TAPCR 1200-03-26-.02(9)

Table 1: Fee-Based Emission Limitations (TPY)

<u>Fee-Based Emission Limitations</u>			
Emission Factors			
(pounds of pollutant per fuel combusted)			
Pollutant	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Reference
Emission Limitations	126.80	6.97	Attachment 3 Attachment 4
	63.40		
Natural Gas (per 1,000,000 cubic feet)	100	5.5	
	50 (1)		
(1) The lower value for NO _x emissions may be used for new furnaces equipped with low NO _x technology. The permittee must maintain on file manufacturer's documentation that support the low NO _x designation.			

E6-8. This source (excluding the pusher preheat furnaces) must comply with the applicable requirements of 40 CFR part 63, Subpart DDDDD which are outlined in **Conditions E18-1 through E18-11** of this permit.

TAPCR 1200-03-09-.03(8)

E7. Emission Source

05-0008-109	Source Identification: Annealing Furnaces		
	The annealing furnaces are used to heat treat the aluminum coils received from the hot line.		
	The furnaces were installed in May 1989. They are natural gas fired and have a 20.0 MMBTU rated heat input design rate each.		
	Annealing Furnaces: No. 4, 5, 6, 7, 8, and 9		
	Stacks:	TNAFRN0452_EP	TNAFRN0453_EP
		TNAFRN0455_EP	TNAFRN0456_EP
			TNAFRN0454_EP
			TNAFRN0457_EP

Conditions E7-1 through E7-5 apply to source 05-0008-109

E7-1. The total maximum heat input design rate for all six annealing furnaces is **120** Million British Thermal Units per hour (MMBtu/hr). Should the permittee need to modify this source in a manner that increases the heat input design rate, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-0.3(8) and permit application dated February 28, 2019 from the permittee.

Compliance Method: The manufacturer specification documents shall be retained as proof of the heat input design rate for the annealing furnaces. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

- E7-2.** Natural gas shall only be used as fuel for the annealing furnaces. The annealing furnaces are only capable of burning this fuel. Should the permittee need to modify this source in a manner that changes the fuel type, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019, from the permittee.

Compliance Method: The permittee shall certify compliance annually with this condition in the annual compliance certification required by **Condition E2(b)** of this permit.

- E7-3.** Emissions from this source shall not exceed the emission limitations in the following table:

Pollutant	Emission Limitation	Regulatory Basis
Particulate Matter	0.02 grains per dry standard cubic foot (6.7 lbs./hr.)	TAPCR 1200-03-07-.04(1)
Nitrogen oxides	16.8 lbs./hr. (daily average basis)	TAPCR 1200-03-06-.03(2)
Volatile organic compounds	NA	TAPCR 1200-03-09-.01(5)(b)10 PAL permit 967460, which was effective December 1, 2013
Sulfur dioxide	1.0 lbs./hr. (daily average basis)	TAPCR 1200-03-14-.01(3)
Carbon Monoxide	10.1 lbs./hr. (daily average basis)	TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with these emission limitations shall be assured by the maximum heat input design rate of the furnaces (**Condition E7-1**), the use of natural gas only as fuel (**Condition E7-2**), and the emission factors (presented below) referenced in *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

Pollutant	Emission Factor (lb./million cubic feet of natural gas)	Reference
Particulate Matter	7.6	Attachment 3
Nitrogen Oxides	100 ^a 50 ^b	Attachment 4
Volatile Organic Compounds	5.5	Attachment 3
Sulfur Dioxide	0.6	Attachment 3
Carbon Monoxide	84	Attachment 4
^a Applies to furnaces Nos. 6, 7 and 9 ^b Applies to furnaces Nos. 4, 5 and 8, letter dated July 18, 2019		

- E7-4.** For fee purposes, the permittee shall calculate the actual emissions of Particulate Matter, Nitrogen Oxides, Volatile Organic Compounds, and Sulfur Dioxide using the emission factors identified in **Condition E7-3**, and the emission factors from the most recent edition of *AP 42, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*.

The calculated emissions and supporting documentation shall be submitted as required by **Condition E1**.

TAPCR 1200-03-26-.02(9)

- E7-5.** This source must comply with the applicable requirements of 40 CFR part 63, Subpart DDDDD which are outlined in **Conditions E18-1 through E18-11** of this permit.

TAPCR 1200-03-09-.03(8)

- E8. RESERVED – [Source 110: No. 049 Slitter – Insignificant]**

E9. Emission Source

05-0008-113 Source Identification: North Plant – Ingot scalping operations where the cast surface is removed from the ingot. The Scalper was installed in April 1991, and has a maximum capacity of 7200 tons per day.

Emission source includes left and right-side crusher and chip collection.

PM Control: Two identical parallel cyclones (right and left)

Stack: TNSCLP0466 (two identical stacks)

Conditions E9-1 through E9-3 apply to source 05-0008-113

- E9-1.** The total material input rate for this source is **300** tons of aluminum ingot per hour. Should the permittee need to modify this source in a manner that increases the material input rate a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019

Compliance Method: The permittee shall certify compliance annually with this condition in the annual compliance certification required by **Condition E2(b)** of this permit.

- E9-2.** Particulate Matter (PM) emitted from this source shall not exceed **5.0** pounds per hour and shall not exceed **2.7** pounds of PM₁₀ per hour on a daily average basis.

TAPCR 1200-03-07-.01(5), Letter of Agreement Dated January 16, 1997

Compliance Method: The control equipment shall be maintained, kept in good operating condition, and inspected semiannually to ensure compliance with the applicable Particulate Matter emission limits. Documentation of the semiannual inspections and any maintenance performed shall be kept on site for a period of not less than five years. A monthly summary of these records shall be kept and reported in accordance with **Condition E2** of this permit.

- E9-3.** For fee purposes, the permittee shall calculate the actual emissions of Particulate Matter using the emission factor of 0.097¹ pounds per hour of Particulate Matter per ton of aluminum scrap generated for the current annual accounting period. The permittee shall collect and maintain records of the amount of aluminum scrap generated from this source.

The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.

This requirement is pursuant to TAPCR 1200-03-26-.02(9).

¹Per the application dated February 28, 2019, this emission factor was developed from screening and analysis of the aluminum fines generated from the scalping operation.

- E10. RESERVED – [Source 114: No. 050 Slitter – Insignificant]**
- E11. RESERVED – [Source 115: No. 048 Slitter – Insignificant]**
- E12. RESERVED – [Cooling Tower – Insignificant]**
- E13. RESERVED – [Boilers removed from service]**
- E14. RESERVED – [Source 111: Carpenter Shop – Insignificant]**
- E15. RESERVED [Source 102: Emergency Fire Water Pump Engine – Insignificant]**

E16. Emission Source

05-0008-100 Source Identification: Automotive Sheet:
 Tandem Cold Mill No. 2 with Airwash Control System
 Continuous Heat Treat Furnace #1 (no controls)
 Trim Line with Electrostatic Lube Sprayer and Leveler (Leveler is an IEU)

Conditions E16-1 through E16-8 apply to source 05-0008-100

Cold Mill No. 2 with Airwash Control System

E16-1. The material input rate for this source shall not exceed **441,000** tons of aluminum during all intervals of 12 consecutive months. Should the permittee need to modify this source in a manner that increases the material input rate, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019.

Compliance Method: The permittee shall demonstrate compliance with this limitation by keeping records of the aluminum processed during each calendar month and during all intervals of 12 consecutive months. A copy of these records shall be made readily available to the Technical Secretary if requested and reported in accordance with **Condition E2** of this permit. The records shall be maintained for a period of not less than five years.

E16-2. Particulate Matter (PM) emitted from this source shall not exceed **18.60** tons during all intervals of 12-consecutive months.

TAPCR 1200-03-07-.01(5) and the agreement letter dated June 11, 2014

The permittee has requested this limit in order to avoid being subject to Rule 1200-03-09-.01(5) of TAPCR.

Compliance Method: Compliance with this emission limitation is based on compliance with **Condition E16-1**. Continuous compliance with this limitation is based on using the emission factor of 0.0138 lb/ton Al for Particulate Matter developed during the performance test dated December 15, 2015, which shows that the Particulate Matter emissions are below the limitation. Routine inspections shall be performed semi-annually on all control equipment. A copy of these records shall be made readily available for inspection by the Technical Secretary or Division representative upon request and reported in accordance with **Condition E2** of this permit.

E16-3. Volatile Organic Compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.

TAPCR 1200-03-07-.07(2) and 1200-03-09-.01(5)(b)10

Compliance Method: Compliance with this requirement shall be demonstrated by maintaining records of VOC emissions and including the result in PAL permit 967460.

Continuous Heat Treat Furnace No. 1 (no controls)

E16-4. Natural gas shall only be used as fuel for the continuous heat treat furnace. The continuous heat treat furnace is only capable of burning this fuel. Should the permittee need to modify this source in a manner that changes the fuel type, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated February 28, 2019, from the permittee.

Compliance Method: The permittee shall certify compliance annually with this condition in the annual compliance certification required by **Condition E2(b)** of this permit.

E16-5. Particulate Matter (PM) emitted from this source shall not exceed **2.23** tons during all intervals of 12-consecutive months.

TAPCR 1200-03-07-.01(5) and the agreement letter dated September 16, 2013, from the permittee.

The permittee has requested this limit in order to avoid being subject to Rule 1200-03-09-.01(5).

Compliance Method: Compliance with this emission limitation is based on using natural gas as the only fuel source for the furnace (**Condition E16-4**), and the PM emission factor of 7.6 lbs./10⁶ scf found in *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Table 1.4-2.

E16-6. Volatile organic compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.

TAPCR 1200-03-07-.07(2) and 1200-03-09-.01(5)(b)10.

Compliance Method: Compliance with this requirement shall be assured by maintaining records of VOC emissions and including the result in PAL permit 967460.

E16-7. Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), and Carbon Monoxide (CO) emissions shall not exceed **14.64** tons during all intervals of 12-consecutive months, **0.18** tons during all intervals of 12-consecutive months, and **24.60** tons during all intervals of 12-consecutive months, respectively.

TAPCR 1200-03-07-.07(2) and 1200-03-14-.01(3)

Compliance Method: Compliance with these emission limitations is based on using natural gas as fuel in the furnace (**Condition E16-4**), the NO_x emission factor of 50 lbs./10⁶ scf, the SO₂ emission factor of 0.6 lbs./10⁶ scf, and the CO emission factor of 84 lbs./10⁶ scf found in *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Tables 1-4-1 & 1.4-2.

E16-8. For fee purposes, the permittee shall calculate the actual emissions of PM, VOC, NO_x and SO₂ from Cold Mill No. 2, Heat Treat Furnace No.1, and the Trim Line using AP-42 emission factors (*AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Tables 1-4-1 & 1.4-2) or emission factors developed during the most recent performance test (for PM/VOC – performance test dated December 15, 2015). The calculated emissions shall be used to calculate fees for the current annual accounting period.

The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.

TAPCR 1200-03-26-.02(9)

E17. Emission Source

05-0008-125	Source Identification: Wastewater Treatment Plant (WWTP) Boiler rated at 2.0 million Btus per hour Gas 1 fuels
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Conditions E17-1 through E17-6 apply to source 05-0008-125

E17-1. The maximum heat input design rate for the boiler is **2.0** Million British Thermal Units per hour (MMBtu/hr). Should the permittee need to modify this source in a manner that increases the heat input design rate, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-0.3(8) and permit application dated March 6, 2019 from the permittee.

Compliance Method: The manufacturer specification documents shall be retained as proof of the heat input design rate for the boiler. These documents shall be kept readily available/accessible for review by the Technical Secretary or a Division representative upon request.

E17-2. Natural gas shall only be used as fuel for the boiler. The boiler is only capable of burning this fuel. Should the permittee need to modify this source in a manner that changes the fuel type, a construction permit or Title V modification shall first be obtained in accordance with TAPCR 1200-03-09-.01 or 1200-03-09-.02(11)(d)1.(i)(V) prior to making the change.

TAPCR 1200-03-09-0.3(8) and permit application dated March 6, 2019 from the permittee.

Compliance Method: The permittee shall certify compliance annually with this condition in the annual compliance certification required by **Condition E2(b)** of this permit.

E17-3. Particulate Matter (PM) emitted from the boiler shall not exceed **0.60** pounds per million Btus (1.20 pounds per hour each).
TAPCR 1200-03-06-.02(2)(a)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E17-1 and E17-2**.

E17-4. Sulfur Dioxide (SO₂) emitted from the boiler shall not exceed **0.001** pounds per hour on a daily average basis.
TAPCR 1200-03-14-.01(3)

Compliance Method: Compliance with this emission limitation is based on the heat input design rate of the boiler (**Condition E17-1**), burning natural gas only as fuel (**Condition E17-2**), and the emission factor of 0.6 lbs./10⁶ scf found in AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Table 1.4-2.

E17-5. Volatile Organic Compounds (VOC) emitted from this source shall be included in VOC PAL (plantwide applicability limit) permit 967460.

TAPCR 1200-03-06-.03(2) and 1200-03-09-.01(5)(b)10

Compliance Method: Compliance with this requirement shall be demonstrated by maintaining records of VOC emissions and including the result in PAL permit 967460.

E17-6. The emission limitations for the boiler in Table 1 were established for fee purposes only. The permittee shall calculate the actual emissions of Nitrogen Oxides and Volatile Organic Compounds using the emission factors identified in Table 1, and *AP-42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Tables 1-4-1 & 1.4-2. The calculated emissions and supporting documentation shall be submitted as required by **Condition E1** of this permit.

TAPCR 1200-03-26-.02(9)

Table 1: Fee-Based Emission Limitations (TPY)

Fee-Based Emission Limitations			
Emission Factors			
(pounds of pollutant per fuel combusted)			
Pollutant	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Reference
Emission Limitations	0.86	0.05	Attachment 3 Attachment 4
Natural Gas (per 1,000,000 cubic feet)	100	5.5	

E17-7. This source must comply with the applicable requirements of 40 CFR part 63, Subpart DDDDD which are outlined in **Conditions E18-1 through E18-11** of this permit.

40 CFR Part 63, Subpart DDDDD Requirements.

Conditions E18-1 through E18-11 apply to sources 05-0008-105, 106, 108, 109, and 125

- E18-1.** Under the Provisions of 40 CFR part 63, subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, boilers and process heaters at this facility are subject to 40 CFR part 60, subpart DDDDDD, as these units are located at, or are part of, a major source of HAPs. 40 CFR§63.7485

In order to comply with 40 CFR part 63, subpart DDDDD, the applicable boilers and process heaters must comply with **Conditions E18-1 through E18-11** of this permit. The applicable requirements of 40 CFR part 63, Subpart DDDDD are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

- E18-2.** Any new or reconstructed boiler or process heater at the existing source must be in compliance with 40 CFR part 63 subpart DDDDD upon startup.

40 CFR §63.7495(c)(1)

Compliance Method: Compliance shall be assured by annual certification as required by **Condition E2(b)** of this permit.

- E18-3.** (a) You must meet the requirements in paragraphs (a)(1) through (3) of 40 CFR §63.7500, except as provided in paragraphs (b), through (e) of 40 CFR §63.7500. You must meet these requirements at all times the affected unit is operating, except as provided in paragraph (f) of 40 CFR §63.7500.

(a)(1) reserved

(a)(1)(i) reserved

(a)(1)(ii) reserved

(a)(1)(iii) reserved

(a)(2) reserved

(a)(3) reserved

(b) reserved

(c) reserved

(d) reserved

(e) Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every five years as specified in 40 CFR §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in 40 CFR §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of 40 CFR part 63 subpart DDDDD, or the operating limits in Table 4 of 40 CFR part 63 subpart DDDDD.

(f) reserved

40 CFR §63.7500

Compliance Method: Compliance shall be demonstrated by conducting a tune-up every five years.

- E18-4.** (a) You must be in compliance with the emission limits, work practice standards, and operating limits in 40 CFR part 63 subpart DDDDD. These emission and operating limits apply to you at all times the affected unit is operating except for the periods noted in 40 CFR §63.7500(f).

(b) reserved

(c) reserved

(d) reserved

(e) reserved

40 §CFR 63.7505

Compliance Method: Compliance shall be assured by annual certification as required by **Condition E2(b)**.

E18-5. (a) reserved

(b) reserved

(c) reserved

(d) reserved

(e) reserved

(f) reserved

(g) For new or reconstructed affected sources (as defined in 40 CFR §63.7490), you must demonstrate initial compliance with the applicable work practice standards in Table 3 of 40 CFR part 63 subpart DDDDD within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR §63.7515(d) following the initial compliance date specified in 40 CFR §63.7495(a). Thereafter, you are required to complete the applicable annual, biennial, or 5-year tune-up as specified in 40 CFR §63.7515(d).

(h) reserved

(k) reserved

40 CFR §63.7510

Compliance Method: Compliance for the initial tune-up has been demonstrated as documented in the Notification of Compliance Status report dated April 24, 2017. Compliance for subsequent tune-ups shall be demonstrated by submitting the required reports outlined in **Condition E18-8**.

E18-6. (a) You must demonstrate continuous compliance with, the work practice standards in Table 3 in 40 CFR part 63 subpart DDDDD, that apply to you according to the methods specified in Table 8 in 40 CFR part 63 subpart DDDDD and paragraphs (a)(10i) through (13) of this condition.

(a)(1) reserved

(a)(2) reserved

(a)(3) reserved

(a)(4) reserved

(a)(5) reserved

(a)(6) reserved

(a)(7) reserved

(a)(8) reserved

(a)(9) reserved

(a)(10) reserved

(a)(10)(i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. 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;

(a)(10)(ii) 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;

(a)(10)(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

(a)(10)(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;

(a)(10)(v) 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

(a)(10)(vi) Maintain on-site and submit, if requested by the Technical Secretary, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) of this condition,

(a)(10)(vi)(A) 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 boiler or process heater;

(a)(10)(vi)(B) A description of any corrective actions taken as a part of the tune-up; and

(a)(10)(vi)(C) 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.

(a)(11) reserved

(a)(12) If your boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 million Btu per hour and the unit is in the units designed to burn gas 1; units designed to burn gas 2 (other); or units designed to burn light liquid subcategories, or meets the definition of limited-use boiler or process heater in 40 CFR §63.7575, you must conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of this condition to demonstrate continuous compliance. You may delay the burner inspection specified in paragraph (a)(10)(i) of this condition until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up.

(a)(13) 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.

(a)(14) reserved

(a)(15) reserved

(a)(16) reserved

(a)(17) reserved

(a)(18) reserved

(a)(19) reserved

(b) reserved

(c) reserved

(d) reserved

40 CFR §63.7540

Compliance Method: Compliance for subsequent tune-ups shall be demonstrated by submitting the required reports outlined in **Condition E18-8**.

E18-7. (a) You must submit to the Technical Secretary all of the notifications in 40 CFR §§63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) through (h) that apply to you by the dates specified.

(b) reserved

(c) As specified in 40 CFR §63.9(b)(4) and (5), if you startup a new or reconstructed affected, you must submit an Initial Notification not later than 15 days after the actual date of startup of the affected source.

(d) reserved

(e) reserved

(f) If you operate a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to 40 CFR part 63 subpart DDDDD, and you intend to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another 40 CFR subpart of 40 CFR part 63 subpart DDDDD, 40 CFR part 60, 61, or 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR §63.7575, you 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 40 CFR §63.7575. The notification must include the information specified in paragraphs (f)(1) through (5) of this condition.

(f)(1) Company name and address.

(f)(2) Identification of the affected unit.

(f)(3) Reason you are 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.

(f)(4) Type of alternative fuel that you intend to use.

(f)(5) Dates when the alternative fuel use is expected to begin and end.

(g) reserved

(h) If you have switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical change resulted in the applicability of a different subcategory, you must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:

(h)(1) The name of the owner or operator of the affected source, as defined in 40 CFR §63.7490, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.

(h)(2) The currently applicable subcategory under 40 CFR part 63 subpart DDDDD.

(h)(3) The date upon which the fuel switch or physical change occurred.

40 CFR §63.7545

Compliance Method: Compliance for the initial tune-up for the WWTP boiler and process heaters has been demonstrated as documented in the Notification of Compliance Status report dated April 24, 2017. Compliance for subsequent tune-ups shall be demonstrated by submitting the required reports outlined in **Condition E18-8**.

E18-8. (a) You must submit each report in Table 9 of 40 CFR part 63 subpart DDDDD that applies to you.

(b) Unless the Technical Secretary has approved a different schedule for submission of reports under 40 CFR §63.10(a), you must submit each report, according to paragraph (h) of this condition, by the date in Table 9 of 40 CFR part 63 subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of this condition. For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to 40 CFR §63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or Table 4 operating limits, you may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(3) and (4) of this condition, instead of a semi-annual compliance report.

(1) reserved

(2) reserved

(3) Each subsequent semi-annual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31.

(4) Each subsequent semi-annual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31.

(5) For each affected source that is subject to permitting regulations pursuant to part 70 or part 71 of 40 CFR, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR §§70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), you may submit subsequent compliance reports according to the dates the permitting authority has established in the permit instead of according to the dates in paragraphs (b)(3) and (4) of this condition.

(c) A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule.

(1) If the facility is subject to the requirements of a tune up you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii) of this condition, (xiv) and (xvii) of this condition.

(2) reserved

(3) reserved

(4) reserved

(5)(i) Company and Facility name and address.

(ii) Process unit information, emissions limitations, and operating parameter limitations.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) reserved

(v) reserved

(vi) reserved

(vii) reserved

(viii) reserved

(ix) reserved

(x) reserved

(xi) reserved

(xii) reserved

(xiii) reserved

(xiv) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to 40 CFR §63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(xv) reserved

(xvi) reserved

(xvii) 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.

(xviii) reserved

(d) reserved

(e) reserved

(f)-(g) reserved

(h) You must submit the reports according to the procedures specified in paragraph (h)(3) of this condition.

(1) reserved

(2) reserved

(3) You must submit all reports required by Table 9 of 40 CFR part 63 subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR 63 subpart DDDDD is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in 40 CFR §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

40 CFR §63.7550

Compliance Method: Compliance for these requirements shall be assured by submitting the reports as required and by annual certification as required by **Condition E2(b)**.

E18-9. (a) You must keep records according to paragraphs (a)(1) and (2) of this condition.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that you submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv).

(2) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR §63.10(b)(2)(viii).

(3) reserved

(b) reserved

- (c) reserved
- (d) reserved
- (e) reserved
- (f) reserved
- (g) reserved

(h) If you operate a unit in the unit designed to burn gas 1 subcategory that is subject to 40 CFR part 63 subpart DDDDD, and you use an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another 40 CFR part 63 subpart under 40 CFR part 63 subpart DDDDD, other gas 1 fuel, or gaseous fuel subject to another 40 CFR part 63 subpart of 40 CFR part 63 subpart DDDDD or 40 CFR part 60, 61, or 65, you 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.

40 CFR §63.7555

Compliance Method: Compliance for these requirements shall be assured by maintaining the records as required and by annual certification as required by **Condition E2(b)**.

E18-10. (a) Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1).

(b) As specified in 40 CFR §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You 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 40 CFR §63.10(b)(1). You can keep the records off site for the remaining 3 years.

40 CFR §63.7560

Compliance Method: Compliance for these requirements shall be assured by maintaining the records as required and by annual certification as required by **Condition E2(b)**.

E18-11. The permittee shall comply with the General Provisions in 40 CFR §§63.1 through 63.15 that apply to the boilers and process heaters subject to 40 CFR part 63, subpart DDDDD.

40 CFR §63.7565

Compliance Method: Compliance shall be assured by annual certification as required by **Condition E2(b)**.

* Note: All emission limitations in parentheses throughout this document are for informational purposes only.

END OF PERMIT NUMBER 576488

ATTACHMENT 1

**OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
dated June 18, 1996 and amended September 11, 2013**

**Decision Tree PM for Opacity for
Sources Utilizing EPA Method 9***

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring - Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

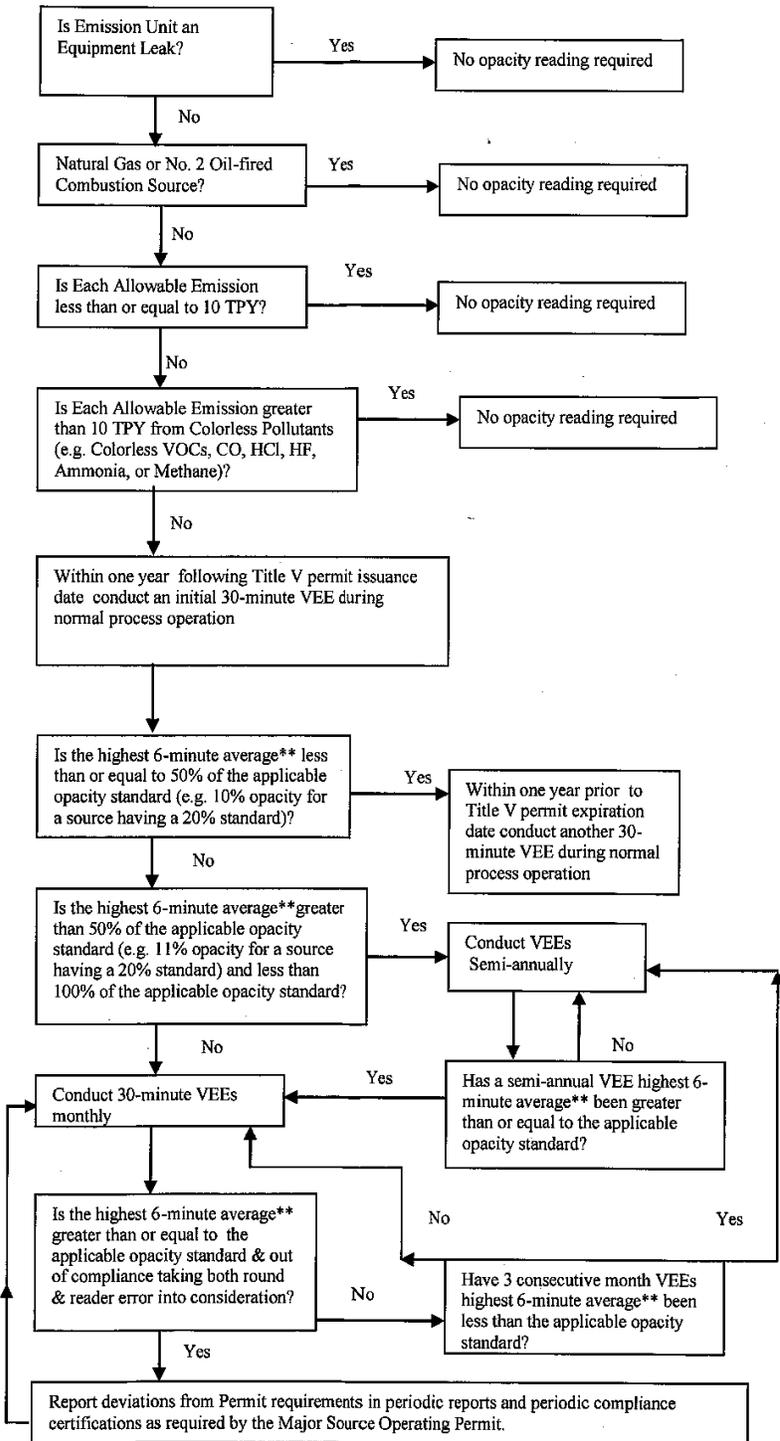
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

**ATTACHMENT 2
COMPLIANCE ASSURANCE MONITORING PLAN FOR
PARTICULATE MATTER (PM) 10 EMISSIONS FROM
FABRICATION**

DATE: August 26, 2020

Compliance Assurance Monitoring Plan for PM-10 Emissions from Fabrication



ARCONIC

Tennessee Operations

Fabrication

ENV-223

Document Manager: C. Newman

Prepared By:

**Arconic Tennessee LLC
2300 North Wright Rd.
Alcoa, Tennessee 37701**

August 26, 2020

Note: This is considered an uncontrolled document unless it is being viewed on-line from the Tennessee Operations Environmental Homepage.

Arconic Tennessee LLC
Compliance Assurance Monitoring Plan
Area: Fabrication

Original Issue Date: 3/31/08
Revision Date: 8/26/2020
Controlled Document

CAM Plan Revision History

Plan Description	Prepared By	Date	Approved By	Date
Original Plan	Chris Moore	3/31/08	Malcolm Murphy	3/31/08
Revision 1	Chris Moore	4/18/08	Chris Jackson	4/18/08
Revision 2	Chris Moore	9/3/09	Chris Jackson	9/3/09
Revision 3	Chris Moore	9/20/11	Chris Jackson	10/10/11
Revision 4	Alisa Hatmaker	2/8/16	Ken A. McMillen	2/8/16
Revision 5	Alisa Hatmaker	11/16/16	Jeffrey C. Weida	11/16/16
Revision 6	Alisa Hatmaker	2/3/17	Jeffrey C. Weida	2/3/17
Revision 7	Caitlin Newman	8/26/20	Jeffrey C. Weida	8/26/20

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 - 1.1 Plant Description and Operation
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 - 2.2 Indicator Range
 - 2.3 Performance Criteria
 - 2.4 Rationale for Performance Criteria
 - 2.4.1 Performance Indicators
 - 2.4.2 Performance indicator Ranges

1.0 INTRODUCTION

Compliance assurance monitoring (CAM) as codified in 40 CFR Part 64 is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act (CAA) for large emission units that rely on pollution control device equipment to achieve compliance. Monitoring is conducted to determine that control measures, once installed or otherwise employed, are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements. The CAM approach establishes monitoring for the purpose of:

1. Documenting continued operation of the control measures with ranges of specified indicators of performance that are designed to provide a reasonable assurance of compliance with applicable requirements;
2. Indicating any excursions from these ranges; and,
3. Responding to the data so that the cause or causes of the excursions are corrected.

The following sections of this CAM Plan address each of the above elements.

1.1 Plant Description and Operation

Fabrication includes the Hot Line, Continuous Cold Mill (CCM), Finishing, and Automotive Sheet production areas in the North Plant. In the Hot Line, aluminum ingots are prepared for rolling by scalping and preheating and then rolled in two hot reversing and one hot continuous mill. The CCM receives cooled coils from the hotline and consists of a Miebach welder that has a cyclone/wet collector for particulate control; an accumulator; and the CCM that consists of the cold mill, a coolant system, and horizontal cyclonic separators (2). Following the CCM, coils are trimmed and re-oiled in the Finishing area.

The automotive sheet production area receives cooled coils from the hotline and consists of three annealing furnaces, one continuous heat treat furnace (CHT), and one tandem cold mill (TCM). The TCM has an airwash oil separation (scrubber) for particulate control.

Affected emission units covered by this CAM plan are summarized in Table 1:

Table 1. Emission Units Subject to CAM Requirements

Emission Unit	Control Device Description	Source ID	Pollutant
Hot Line 120" Mill	120" Mill horizontal cyclonic separators (2)	05-0090-43	PM-10
Hot Line 96" Mill	120" Mill horizontal cyclonic separators (2)	05-0090-43	PM-10
Hot Line 80" Mill	80" Mill horizontal cyclonic separators (2)	05-0090-43	PM-10
CCM	Cold mill horizontal cyclonic separators (2)	05-0090-42	PM-10
TCM	Airwash oil separator (1)	05-0008-100	PM-10

1.2 Applicable Requirements

Applicable requirements that result in applicability of CAM are summarized in Table 2 below:

Table 2. Applicable Requirements Resulting in CAM Applicability

Emission Unit	Requirement	Basis	Compliance Methodology
Hot Line 80", 96", and 120" Mills	PM shall not exceed 61 pounds per hour	TAPCR 1200-3-7-.02(4)	1) Semi-annual maintenance inspections 2) Daily throughputs and established PM emission factors
CCM	PM shall not exceed 19.57 pounds per hour	TAPCR 1200-3-9-.01(4); Permit 742926P Condition 2	1) Semi-annual maintenance inspections 2) Daily fan pressure readings
TCM	PM shall not exceed 9.29 tons per 12-consecutive months	TAPCR 1200-3-9-.01(5); Permit 967461P Condition 2	1) Semi-annual maintenance inspections 2) Daily airwash coolant flow rate and established PM emission factors

1.3 Control Technology

The control technology utilized for the 96" Mill, 120" Mill, 80" Mill and the CCM is a high velocity, in-line oil mist eliminator specifically designed for rolling mills. The system separates liquid particles from the air stream and then removes the particles before re-entrainment. The stack configuration is designed to enable continued oil removal including a specially designed liquid skimmer at the stack exit prior to discharge.

The control technology utilized for the TCM is an oil scrubbing system. Exhaust from the mill is routed through a scrubber where coolant is utilized to remove organics and particulate matter from the exhaust stream. The collected material is reprocessed and reused in the system.

2.0 CAM PLAN ELEMENTS

2.1 Indicators to be Monitored (64.3(a)(1))

Indicators of emission control performance of the control device must be monitored to assure compliance with emission limitations or standards. The following indicators are to be monitored:

Emission Unit	Parameter
120" Mill	Cyclonic separator fan amperage
	Routine inspection and maintenance
96" Mill	Cyclonic separator fan amperage
	Routine inspection and maintenance
80" Mill	Cyclonic separator fan amperage
	Routine inspection and maintenance
CCM	Cyclonic separator fan pressure
	Routine inspection and maintenance
TCM	Airwash coolant flow rate
	Routine inspection and maintenance

2.2 Indicator Range (64.3(a)(2))

The indicator range for the emission unit will be as follows:

Emission Unit	Parameter	Indicator Range	Excursion Trigger
120" Mill	Fan Amperage	Alarm set point at 192 amps (65% of the nominal design flow) except during periods of mill start-up and shutdown	Failure to respond to amperage alarms
	Inspection/Maintenance Activities	Perform routine maintenance/inspections	Failure to perform routine preventative maintenance/inspections
96" Mill	Fan Amperage	Alarm set point at 192 amps (65% of the nominal design flow) except during periods of mill start-up and shutdown	Failure to respond to amperage alarms
	Inspection/Maintenance Activities	Perform routine maintenance/inspections	Failure to perform routine preventative maintenance/inspections
80" Mill	Fan Amperage	Alarm set point at 360 amps (65% of the nominal design flow) except during periods of mill start-up and shutdown	Failure to respond to amperage alarms
	Inspection/Maintenance Activities	Perform routine maintenance/inspections	Failure to perform routine preventative maintenance/inspections

Emission Unit	Parameter	Indicator Range	Excursion Trigger
CCM	Fan Pressure Drop	Alarm set point between 3 and 8 inches of water across the cyclone except during periods of mill start-up and shutdown	Failure to respond to alarms
	Inspection/Maintenance Activities	Perform routine maintenance/inspections	Failure to perform routine preventative maintenance/inspections
TCM	Airwash coolant flow rate	Alarm set point at 180 l/min (90% of the nominal design flow) except during periods of mill start-up and shutdown.	Failure to respond to coolant flow alarms
	Inspection/Maintenance Activities	Perform routine maintenance/inspections	Failure to perform routine preventative maintenance/inspections

2.3 Performance Criteria (64.3(b))

Performance criteria for each emission unit are summarized in Tables 1 and 2 below:

Table 1. Performance Criteria for the 80", 96", and 120" Mill Control Systems

Criteria	Parameter	Monitoring Requirement
Data Representativeness	Fan Amperage	Monitor average fan amperage during ingot or coil runs. When the alarm is triggered, action will be taken at the next available maintenance period to restore nominal flow. The alarms will appear on the 80", 96", and 120" Mill operator's screen. The alarms will only trigger if the mill is running to avoid false alarms during down periods.
	Inspection and maintenance	Proper operation of the cyclone system is verified visually by trained personnel using documented inspection and maintenance procedures. Repairs of deficiencies noted during the inspection process are made in a timely manner and documented.
QA/QC Practices	Fan amperage	Continuous recording of the fan amperage. Annual calibration is performed on the amperage meter per manufacturer recommendations. Calibration records shall be maintained for a period not less than 5 years.

Table 1. Performance Criteria for the 80", 96", and 120" Mill Control Systems

Criteria	Parameter	Monitoring Requirement
	Inspection and maintenance	Personnel are trained on inspection and maintenance procedures. Maintenance records are maintained on file.
Monitoring Frequency	Fan amperage	Continuous (when operating); alarm is based on average value during ingot or coil run
	Inspection and maintenance	s required

Table 2. Performance Criteria for the CCM Control System

Criteria	Parameter	Monitoring Requirement
Data Representativeness	Fan Pressure Drop	Monitor fan pressure drops during coil runs. When the alarm is triggered, action will be taken at the next available maintenance period to restore nominal flow. The alarms will appear on the mill operator's screen. The alarms will only trigger if the mill is running to avoid false alarms during down periods.
	Inspection and maintenance	Proper operation of the cyclone system is verified visually by trained personnel using documented inspection and maintenance procedures. Repairs of deficiencies noted during the inspection process are made in a timely manner and documented.
QA/QC Practices	Fan Pressure Drop	Continuous recording of the fan pressure drop. Annual calibration is performed on the pressure drop monitor in order to determine if adjustments are needed. Calibration records shall be maintained for a period not less than 5 years.
	Inspection and maintenance	Personnel are trained on inspection and maintenance procedures. Maintenance records are maintained on file.
Monitoring Frequency	Fan Pressure Drop	Continuous (when operating)
	Inspection and maintenance	As required

Table 3. Performance Criteria for the TCM Control System

Criteria	Parameter	Monitoring Requirement
Data Representativeness	Coolant Flow Rate	Monitor flow rate during coil runs. When the alarm is triggered, action will be taken at the next available maintenance period to restore nominal flow. The alarms will appear on the TCM Mill operator's screen.
	Inspection and maintenance	Proper operation of the airwash system is verified visually by trained personnel using documented inspection and maintenance procedures. Repairs of deficiencies noted during the preventative maintenance (PM) inspection process are made in a timely manner and documented. Records shall be maintained for a period not less than 5 years.
QA/QC Practices	Coolant Flow Rate	Continuous recording of the coolant flow rate. A PM inspection is performed on the coolant flow pump. Repairs of deficiencies noted during the PM inspection process are made in a timely manner and documented records shall be maintained for a period not less than 5 years.
	Inspection and maintenance	Personnel are trained on inspection and maintenance procedures. Maintenance records are maintained on file.
Monitoring Frequency	Coolant Flow Rate	Continuous (when operating); Instantaneous value during coil run.
	Inspection and maintenance	As required.

2.4 Rationale for Performance Criteria (64.4(b))

2.4.1 Performance Indicators

80", 96" and 120" Mills

Proper operation of the cyclonic separator systems is directly related to the volumetric flow rate produced by the exhaust fans. If the separators in the system accumulate debris, fire dampeners are closed, or flow is otherwise restricted, the volume moved by the fans will decrease. The resulting decrease in flow is detected as a drop in horsepower at the fan motors.

Documented inspections are used to identify potential leaks and equipment problems that may affect the system's capture efficiency. A documented maintenance program ensures that any deficiencies noted during the inspection process are repaired in a timely fashion.

CCM

Although the 80" Mill, 96" Mill, 120" Mill and CCM cyclonic separator systems are similar in operations, the nature of the rolling activities are significantly different from an emissions standpoint. Coolant usage is much lower in the CCM and buildup on exhaust fans for the CCM is much less of an issue. In that regard, an alternative methodology for the CCM is necessary. Indicators of problems with the CCM is insufficient fan circulation and buildup of oil inside the stack. Low pressure readings indicate there are problems with the fan's circulation equipment allowing for improper exhaust emissions removal. High pressure readings indicate the exhaust stack may be plugged allowing for improper fan circulation and exhaust emissions removal.

Documented inspections are used to identify potential leaks and equipment problems that may affect the system's capture efficiency. A documented maintenance program ensures that any deficiencies noted during the inspection process are repaired in a timely fashion.

TCM

The nature of the rolling activities for the TCM are significantly different from an emissions standpoint than the 80" Mill, 96" Mill, 120" Mill and CCM cyclonic separator systems. Buildup on exhaust ductwork and fans for the TCM is much less of an issue than the 80" Mill, 96" Mill, 120" Mill, and CCM. In that regard, an alternative methodology for the TCM was necessary. A primary indicator of problems with the TCM is significantly lower coolant flow through the airwash system. The coolant is designed to remove the particulate matter and organics from the exhaust stream. A primary indicator of a problem with the airwash control system is low coolant flow. Some lower levels are normal, however, significantly lower flow below the nominal design indicates additional actions may be required.

Documented inspections are used to identify potential leaks and equipment problems that may affect the system's capture efficiency and the coolant flow pump. A documented maintenance program ensures that any deficiencies noted during the inspection process are repaired in a timely fashion.

2.4.2 Performance Indicator Ranges

80", 96", and 120" Mills

Using an amperage reading and the fan curve for the separator fans, horsepower will be calculated and utilized to determine the volumetric flow rate through the system. Each fan will have an alarm point set at 360 amps (80" Mill) and 192 amps (96" Mill and 120" Mill). Amperage readings below the alarm value indicate the potential presence of a problem or upset condition that requires investigation and are treated as potential excursions. Upon completion of investigation, verified excursions will be reported to the TDAPC in required semi-annual reports and annual compliance certifications.

CCM

Using a standard pressure drop gauge, pressure drops will be recorded and utilized to indicate the presence of a potential problem with the control system or upset condition that requires investigation. Pressure drop readings below or above the alarm set points of 3 and 8 inches indicate the potential presence of a problem or upset condition that requires investigation and are treated as potential excursions. Upon completion of investigation, verified excursions will be reported to the TDAPC in required semi-annual reports and annual compliance certifications.

TCM

The coolant flow pump will be used to determine flow rate through the system by calculating flow based on pump speed. The meter will have an alarm point set at 180 l/min. Readings below the alarm value indicate the potential presence of a problem or upset condition that requires investigation and are treated as potential excursions. Upon completion of investigation, verified excursions will be reported to the TDAPC in required semi-annual reports and annual compliance certifications.

ATTACHMENT 3

Section 1.4 of AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*

NATURAL GAS COMBUSTION

Table 1.4-2

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION^a

Pollutant	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
CO ₂ ^b	120,000	A
Lead	0.0005	D
N ₂ O (Uncontrolled)	2.2	E
N ₂ O (Controlled-low-NO _x burner)	0.64	E
PM (Total) ^c	7.6	D
PM (Condensable) ^c	5.7	D
PM (Filterable) ^c	1.9	B
SO ₂ ^d	0.6	A
TOC	11	B
Methane	2.3	B
VOC	5.5	C

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

^b Based on approximately 100% conversion of fuel carbon to CO₂. CO₂[lb/10⁶ scf] = (3.67) (CON) (C)(D), where CON = fractional conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2x10⁴ lb/10⁶ scf.

^c All PM (total, condensable, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM₁₀, PM_{2.5} or PM₁ emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

^d Based on 100% conversion of fuel sulfur to SO₂.

Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.

ATTACHMENT 4

Section 1.4 of AP-42, *Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*

NATURAL GAS COMBUSTION

Table 1.4-1

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO)
FROM NATURAL GAS COMBUSTION^a

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO _x ^b		CO	
	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS) ^c	280	A	84	B
Uncontrolled (Post-NSPS) ^c	190	A	84	B
Controlled - Low NO _x burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO _x burners	50	D	84	B
Controlled - Low NO _x burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

^b Expressed as NO₂. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

^c NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

ATTACHMENT 5

TITLE V FEE SELECTION FORM



DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF AIR POLLUTION CONTROL
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
 Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

APC 36

TITLE V FEE SELECTION

Type or print and submit to the email address above.			
FACILITY INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]			
2. Site name (if different from legal name)			
3. Site address (St./Rd./Hwy.)			County name
City			Zip code
4. Emission source reference number		5. Title V permit number	
FEE SELECTION			
This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.			
6. Payment Schedule (choose one):			
Calendar Year Basis (January 1 – December 31) <input type="checkbox"/>		Fiscal Year Basis (July 1 – June 30) <input type="checkbox"/>	
7. Payment Basis (choose one):			
Actual Emissions Basis <input type="checkbox"/>		Allowable Emissions Basis <input type="checkbox"/>	Combination of Actual and Allowable Emissions Basis <input type="checkbox"/>
8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.			
Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

TITLE V PERMIT STATEMENT

Renewal

Facility Name: Arconic Inc. – Tennessee Operations North Plant Fabrication, Support, and Remediation
City: Alcoa
County: Blount

Date North Plant Fabrication, Support, and Remediation Renewal Application Received:	March 1, 2019
Date North Plant Fabrication, Support, and Remediation Application Deemed Complete:	March 1, 2019

Emission Source Reference Number:	05-0008 North Plant Fabrication, Support and Remediation
Permit Number:	576488

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to Arconic Inc. – Tennessee Operations and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD - Prevention of Significant Deterioration

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards

MACT - Maximum Achievable Control Technology

NSR - New Source Review

I. Identification Information

A. Source Description: Arconic Inc. – Tennessee Operations is located in Alcoa, Tennessee. The facility is a primary and secondary aluminum manufacturer. North Plant Fabrication includes the following emission units or activities.

List and describe emission source(s):

05-0008-105, Continuous Cold Mill, with Process Heater

05-0008-106, Hot Line, with Process Heaters

05-0008-108, Preheat Furnaces 61 - 87

05-0008-109, Annealing Furnaces

05-0008-113, Aluminum Ingot Scalping Operation

05-0008-100, Automotive Sheet Line

05-0008-125, Wastewater Treatment Plant Boiler

B. Source Description: Arconic Inc. – Tennessee Operations is located in Alcoa, Tennessee. The facility is a primary and secondary aluminum manufacturer. North Plant Remediation includes only insignificant emission units or activities.

C. Insignificant Activities

Various insignificant activities are listed in the permit applications

D. Minor Modification Applications Included in Renewal 576488

Minor Modification Application dated March 2, 2019

The facility submitted calculations that showed slitters 048, 049 and 050 are insignificant activities or emission units. The slitters, process emission sources 110, 114 and 115, are not included in this renewal permit.

The facility also submitted calculations that demonstrate that the carpenter shop is an insignificant activity or emissions unit. The carpenter shop, process emission source 111, is not included in the renewal permit.

Minor Modification Application dated July 18, 2019

The facility replaced a total of four annealing furnace combustion systems to meet the Division's Low NOx requirement per TAPCR 1200-03-06-.03(2), "best equipment and technology." The renewal permit was changed to reflect the AP-42 emission factor for low NOx burners of 50 lb NOx per million cubic feet of natural gas.

E. Facility Classification

1. Attainment or Non-Attainment Area Location

Area *is* designated as an attainment area for ozone and PM_{2.5}.

2. Company *is* located in a *Class II* area.

F. Regulatory Status

1. PSD/NSR

This facility is a major source under PSD.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?
		Major or Non-Major Source Status
PM	Yes	Major
PM ₁₀	Yes	Major
SO ₂	Yes	Major
VOC	Yes	Major
NO _x	Yes	Major
CO	Yes	Major
GHG (CO ₂ e)	Yes	Major
Individual HAP	yes	Major
Total HAPs	yes	Major

3. MACT Standards

This facility is a major source for HAPs.

This facility is subject to:

40 CFR part 63 subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. Although the facility is subject to 40 CFR part 63 subpart RRR, it is not applicable to any of the sources in this permit. The facility has other active permits which have sources subject to 40 CFR part 63 subpart RRR.

This portion of the facility may be subject to 40 CFR part 63 subpart GGGGG, National Emission Standards for Hazardous Air Pollutants: Site Remediation, if an action project triggers applicability.

Some sources (05-0008-105, 106, 108, 109, and 125) at the facility are subject to 40 CFR part 63 subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

4. Program Applicability

Are the following programs applicable to the facility?

PSD *yes*

NESHAP *yes*

NSPS *yes*

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? *Yes*

Are there any applicable requirements that will become effective during the permit term? *No*

III. Other Requirements

A. Emissions Trading

The facility *is not* involved in an emission trading program.

B. Acid Rain Requirements

This facility *is not* subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not Applicable

IV. Public Participation Procedures

A. Notification of this draft permit was mailed to the following environmental agencies:

1. EPA Region 4 Air Planning Branch
2. North Carolina
3. Cherokee Nation
4. Knox County

B. Date of Public Notice

September 23, 2020

Comments:

C. Date of Public Hearing

TBD

Comments: