



MAJOR SOURCE OPERATING PERMIT

Permittee: American Foam Cast, Inc.

Facility Name: American Foam Cast, Inc.

Facility No.: 309-0044

Location: Sylacauga, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, <u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, <u>Ala. Code</u> §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date: October X, 2020

Expiration Date: October X, 2025

Alabama Department of Environmental Management

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1.	Tran	<u>sfer</u>	
	or ot piece	permit is not transferable, whether by operation of law herwise, either from one location to another, from one of equipment to another, or from one person to her, except as provided in Rule 335-3-1613(1)(a)5.	Rule 335-3-1602(6)
2.	Rene	ewals	
	six (pplication for permit renewal shall be submitted at least 6) months, but not more than eighteen (18) months, e the date of expiration of this permit.	Rule 335-3-1612(2)
	to op and	source for which this permit is issued shall lose its right erate upon the expiration of this permit unless a timely complete renewal application has been submitted in the time constraints listed in the previous paragraph.	
3.	Seve	rability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.		Rule 335-3-1605(e)
4.	Com	<u>pliance</u>	
	(a)	The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-1605(f)
	(b)	The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-1605(g)

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5.	Termination for Cause	
	This 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 will not stay any permit condition.	Rule 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness:	
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to 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.	Rule 335-3-1607(a)
10.	Inspection and Entry	
	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of	Rule 335-3-1607(b)

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		ronmental Management and EPA to conduct the wing:				
	(a)	Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;				
	(b)	Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;				
	(c)	Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;				
	(d)	Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.				
11.	Com	pliance Provisions				
	(a)	The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-1607(c)			
	(b)	The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.				
12.	Com	pliance Certification				
		ompliance certification shall be submitted annually in 60 days of the anniversary date of issuance of this ait.	Rule 335-3-1607(e)			
	(a)	The compliance certification shall include the following:				
		(1) The identification of each term or condition of this permit that is the basis of the certification;				
		(2) The compliance status;				
		(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with				

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		ADEM Admin. Code r. 335-3-1605(c) (Monitoring and Recordkeeping Requirements);	
		(4) Whether compliance has been continuous or intermittent;	
		(5) Such other facts as the Department may require to determine the compliance status of the source;	
	(b)	The compliance certification shall be submitted to:	
	Alat	pama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463	
		and to:	
		Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13.	Reo	pening for Cause	
		er any of the following circumstances, this permit will be ened prior to the expiration of the permit:	Rule 335-3-1613(5)
	(a)	Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.	
	(b)	Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.	
	(c)	The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	

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	(d)	The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	
14.	<u>Addi</u>	itional Rules and Regulations	
	exist Rule	permit is issued on the basis of Rules and Regulations ing on the date of issuance. In the event additional s and Regulations are adopted, it shall be the permit er's responsibility to comply with such rules.	Alabama 1975, as
15.	<u>Equi</u>	ipment Maintenance or Breakdown	
	(a)	In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	
		(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
		(2) The expected length of time that the air pollution control equipment will be out of service;	
		(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
		(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
		(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
	(b)	In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable	

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		shall work perting the	dard, the person responsible for such equipment notify the Director within 24 hours or the next ing day and provide a statement giving all nent facts, including the estimated duration of breakdown. The Director shall be notified when reakdown has been corrected.	
16.	Ope	ation o	of Capture and Control Devices	
	whice operations operated the analysis as to	h this ated at sions o above ed	ution control devices and capture systems for permit is issued shall be maintained and all times in a manner so as to minimize the f air contaminants. Procedures for ensuring that quipment is properly operated and maintained so nize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
17.	<u>Obn</u>	oxious	<u>Odors</u>	
	obnoverification odors	oxious led by lous em Alabam these	t is issued with the condition that, should odors arising from the plant operations be Air Division inspectors, measures to abate the issions shall be taken upon a determination by a Department of Environmental Management measures are technically and economically	Rule 335-3-108
18.	<u>Fugi</u>	tive Du		
	(a)	eman	autions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ns, dryers, hoppers, ductwork, etc.	Rule 335-3-402
	(b)	in the airbo follow	or haul roads and grounds will be maintained e following manner so that dust will not become rne. A minimum of one, or a combination, of the ving methods shall be utilized to minimize rne dust from plant or haul roads and grounds:	
		(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
		(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	

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	(3) By paving;			
		(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
	adeq and exclu contr Alter	uately ground isively col tech native	or a combination, of the above methods fail to reduce airborne dust from plant or haul roads is, alternative methods shall be employed, either or in combination with one or all of the above uniques, so that dust will not become airborne. The methods shall be approved by the Department ization.	
19.	<u>Addi</u>	tions a	and Revisions	
			cations to this source shall comply with the procedures in Rules 335-3-1613 or 335-3-16-	Rule 335-3-1613 and .14
20.	Recordkeeping Requirements			
	(a)		rds of required monitoring information of the ce shall include the following:	Rule 335-3-1605(c)2.
		(1)	The date, place, and time of all sampling or measurements;	
		(2)	The date analyses were performed;	
		(3)	The company or entity that performed the analyses;	
		(4)	The analytical techniques or methods used;	
		(5)	The results of all analyses; and	
		(6)	The operating conditions that existed at the time of sampling or measurement.	
	(b)	and at le samp infor recon	ntion of records of all required monitoring data support information of the source for a period of east 5 years from the date of the monitoring ole, measurement, report, or application. Support mation includes all calibration and maintenance rds and all original strip-chart recordings for muous monitoring instrumentation and copies of eports required by the permit.	

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21.	Rep	orting Requirements	
	(a)	Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-1604(9).	Rule 335-3-1605(c)3.
	(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22.	<u>Emi</u>	ssion Testing Requirements	
	prov safet acco 40 o	n point of emission which requires testing will be ided with sampling ports, ladders, platforms, and other by equipment to facilitate testing performed in rdance with procedures established by Part 60 of Title f the Code of Federal Regulations, as the same may be inded or revised.	Rule 335-3-105(3) Rule 335-3-104(1)
in advance o submitted as		Air Division must be notified in writing at least 10 days advance of all emission tests to be conducted and mitted as proof of compliance with the Department's air ation control ADEM Admin. Code R.s and regulations.	
	proc	avoid problems concerning testing methods and edures, the following shall be included with the ication letter:	
	(1)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	

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	(3) A description of the process(es) to be tested include the feed rate, any operating parameters used control or influence the operations, and the recapacity.	to
	(4) A sketch or sketches showing sampling polications and their relative positions to the near upstream and downstream gas flow disturbances.	
	A pretest meeting may be held at the request of the sou owner or the Air Division. The necessity for such a meet and the required attendees will be determined on a case- case basis.	ting
	All test reports must be submitted to the Air Division wit 30 days of the actual completion of the test unless extension of time is specifically approved by the Air Division	an
23.	Payment of Emission Fees	
	Annual emission fees shall be remitted each year accord to the fee schedule in Rule 335-1-704.	ling Rule 335-1-704
24.	Other Reporting and Testing Requirements	
	Submission of other reports regarding monitoring reconfuel analyses, operating rates, and equipment malfunction may be required as authorized in the Department's pollution control rules and regulations. The Department may require emission testing at any time.	ons air
25.		
	<u>Title VI Requirements (Refrigerants)</u>	
	Any facility having appliances or refrigeration equipment including air conditioning equipment, which use Class Class II ozone-depleting substances as listed in 40 CFR II 82, Subpart A, Appendices A and B, shall service, repand maintain such equipment according to the way practices, personnel certification requirements, and certification and recovery equipment specified in 40 CFR II 82, Subpart F.	I or Part pair, vork fied
	Any facility having appliances or refrigeration equipment including air conditioning equipment, which use Class Class II ozone-depleting substances as listed in 40 CFR I 82, Subpart A, Appendices A and B, shall service, repand maintain such equipment according to the way practices, personnel certification requirements, and certification and recovery equipment specified in 40 CFR I	I or Part pair, vork fied Part any ring

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	recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.			
26.	Che	mical .	Accidental Prevention Provisions	
	If a chemical listed in Table 1 of 40 CFR 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:		in quantities greater than the threshold quantity	40 CFR Part 68
	(a)		owner or operator shall comply with the isions in 40 CFR Part 68.	
	(b)		owner or operator shall submit one of the wing:	
		(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27.	Disp	lay of	<u>Permit</u>	
	at th	ne site s ted and	t shall be kept under file or on display at all times where the facility for which the permit is issued is d will be made readily available for inspection by persons who may request to see it.	Rule 335-3-1401(1)(d)
28.	Circ	umver	<u>ntion</u>	
	any redu conc	device action in ceals or	shall cause or permit the installation or use of e or any means which, without resulting in in the total amount of air contaminant emitted, r dilutes any emission of air contaminant which erwise violate the Division 3 rules and regulations.	Rule 335-3-110
29.	Visi	ble Em	nissions en	
	this discl than sour	permitharge in 20% cce disc	derwise specified in the Unit Specific provisos of t, any source of particulate emissions shall not more than one 6-minute average opacity greater in any 60-minute period. At no time shall any charge a 6-minute average opacity of particulate greater than 40%. Opacity will be determined by	

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		CFR Part 60, Appendix A, Method 9, unless otherwise ified in the Unit Specific provisos of this permit.	
30.	Fuel	-Burning Equipment	
	(a)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Rule 335-3-403.	Rule 335-3-403
	(b)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Rule 335-3-501.	Rule 333-3-301
31.	Proc	ess Industries – General	
	this	ess otherwise specified in the Unit Specific provisos of permit, no process may discharge particulate emissions access of the emissions specified in Rule 335-3-404.	Rule 335-3-404
32.	Ave	raging Time for Emission Limits	
	for t	ess otherwise specified in the permit, the averaging time the emission limits listed in this permit shall be the inal time required by the specific test method.	Rule 335-3-105
33.	Com	pliance Assurance Monitoring (CAM)	
	appl requ emis	ditions (a) through (d) that follow are general conditions icable to emissions units that are subject to the CAM irements. Specific requirements related to each sions unit are contained in the unit specific provisos the attached CAM appendices.	
	(a) C	Operation of Approved Monitoring	40 CFR 64.7
	(1	1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
	(2	2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for	

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routine repairs of the monitoring equipment.

- (3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is anv sudden, infrequent, reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (4) Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutantspecific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation. recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in

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response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	
(2) Elements of a QIP:	
 a. The owner or operator shall maintain a written QIP, if required, and have it available for inspection. 	

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b. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:				
i. Improved preventive maintenance practices.				
ii. Process operation changes.				
iii. Appropriate improvements to control methods.				
iv. Other steps appropriate to correct control performance.				
v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).				
(3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.				
(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:				
a. Failed to address the cause of the control device performance problems; or				
b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.				
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable				

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re	quirements under the Act.		
(c) Repo	rting and Recordkeeping Requirements	40 CFR 64.9	
(1) Ge	eneral reporting requirements		
a.	On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-1605(c)3.		
b.	A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-1605(c)3. and the following information, as applicable:		
	i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;		
	ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and		
	iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.		
(2) G	eneral recordkeeping requirements.		
a.	The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions		

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	taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).			
	Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.			
(d) Saving	gs Provisions	40 CFR 64.10		
(1) Not	thing in this part shall:			
	Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.			
	Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.			

Summary Page for Foam Pattern Making Process

Permitted Operating Schedule:

24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
FUG	Foam Pattern Making Process	VOC	N/A	N/A

Provisos for Foam Pattern Making Process

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Applicability		
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603	
Emission Standards		
1. This process is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A	
Compliance and Performance Test Methods and Procedures		
1. This process is subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A	
Emission Monitoring		
1. This process is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A	
Recordkeeping and Reporting Requirements		
1. This process is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A	

Summary Page for Two Aluminum Melting Furnaces

Permitted Operating Schedule:

24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
002	Two Natural Gas Aluminum Melting Furnaces	PM	The lesser of: 3.74 lb/hr or The allowable set by 3.59(P) ^{0.62}	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
		Opacity	20%/40%	Rule 335-3-401(1)
		SO_2	N/A	N/A
		NO_X	N/A	N/A
		CO	N/A	N/A
		VOC	N/A	N/A

Provisos for Two Aluminum Melting Furnaces

Fe	ederally Enforceable Provisos	Regulations
A	pplicability	
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401, "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3.	These sources are subject to the applicable requirements of ADEM Admin Code r. 335-3-404, "Control of Particulate emissions – Process Industries – General".	Rule 335-3-404
4.	These sources have an enforceable limit in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
Et	nission Standards	
1.	Visible emissions from these units shall not exceed the opacity limitations as specified in General Proviso No. 29.	Rule 335-3-401(1)
2.	Particulate matter emissions from these sources shall not exceed the lesser of the Anti-PSD limit of 3.47 lb/hr or the allowable set by ADEM Admin. Code r. 335-3-404(1).	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
3.	Only clean metal such as "pigs", foundry returns, and similar types of clean aluminum shall be charged or melted in the furnaces.	Rule 335-3-1604
Co	ompliance and Performance Test Methods and Procedures	
1.	Method 9 of 40 CFR Part 60, Appendix A, shall be used in the determination of opacity.	Rule 335-3-105
2.	Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-105
E1	nission Monitoring	
1.	These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A

Recordkeeping and Reporting Requirements

1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.

Summary Page for EPS Casting/Molding Unit w/ Shared Baghouse

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
	EPS Casting and Molding with Shared Baghouse	PM	The lesser of: 23.78 lb/hr or The allowable set by 17.31(P) ^{0.16}	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
		Styrene	N/A	N/A
001		Benzene	N/A	N/A
		CO	N/A	N/A
		NO_X	N/A	N/A
		SO_2	N/A	N/A
		Opacity	20%/40%	Rule 335-3-401(1)
		HAPs	N/A	N/A

Provisos for EPS Casting/Molding Unit w/ Shared Baghouse

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-40, "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401
3. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-404, "Control of Particulate Emissions – Process Industries – General".	Rule 335-3-404
4. This source has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1404 (Anti-PSD)
5. This process is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR §64.2
Emission Standards	
1. Visible emissions from this source shall not exceed the opacity limitations as specified in General Proviso No. 29.	Rule 335-3-401(1)
2. Particulate matter emissions from the EPS Casting/Molding Unit shall not exceed the lesser of the Anti-PSD limit of 23.78	Rule 335-3-1404 (Anti-PSD)
lb/hr or the allowable set by ADEM Admin. Code r. 335-3-404(1).	Rule 335-3-404(1)
3. The EPS Casting/Molding Unit shall not operate more than 4,800 hours in any consecutive twelve month period.	Rule 335-3-1404 (Anti-PSD)
	40 CFR Part 64
4. The shared baghouse shall maintain an opacity reading less than five percent (5%) and not exceed ten percent (10%) for more than four (4) hours.	40 CFR Part 64
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60, Appendix A, shall be used in the determination of opacity.	Rule 335-3-105
2. Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-105

Emission Monitoring

1. Reference Appendix A for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".

40 CFR §64.7

2. The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If the instantaneous opacity of emissions in excess of 10% are noted at any time and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.

Rule 335-3-16-.05(c)

3. The facility shall conduct the following weekly inspections:

Rule 335-3-16-.05(c)

- (a) Check hopper, fan, and cleaning cycle for proper operation.
- (b) Perform a visual check of all hoods and ductwork.
- 4. The facility shall conduct an annual inspection of the complete baghouse unit. This shall include:

Rule 335-3-16-.05(c) 40 CFR Part 64

- (a) Baghouse structure, access doors, door seals, and bags.
- (b) An internal inspection of the baghouse hoppers.
- 5. The facility shall monitor differential pressure of the baghouse daily.

40 CFR Part 64

6. The facility shall calibrate the pressure gauge annually. If an erratic or abnormal reading is observed then the instrument shall be inspected and either calibrated or replaced.

40 CFR Part 64

Recordkeeping and Reporting Requirements

1. All record shall be maintained in a form suitable for inspection for a period of at least five years.

Rule 335-3-16-.05(c)

2. The facility shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken.

Rule 335-3-16-.05(c)

3. If a visible emission observation is required using the 40 CFR, Part 60, Appendix A, Method 9, the results should be documented using an ADEM visible emissions observation report, and the cause and corrective action taken will be documented.

Rule 335-3-16-.05(c)

4. The facility shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department

40 CFR Part 64

within two (2) working days.

5. Records of monthly and 12-month rolling totals of the hours of Rule 335-3-16-.05(c) operation shall be recorded.

Summary Page for Three Shotblast Machines w/ Shared Baghouse

Permitted Operating Schedule:

24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
	Goff Shotblast Machine with Baghouse	РМ	The lesser of: 15.52 lb/hr or The allowable set by 3.59(P) ^{0.62}	Rule 335-3-1404 (Anti-PSD) Rule 335-3-404(1)
001	DeLong Shotblast Machine with Baghouse	PM	3.59(P) ^{0.62}	Rule 335-3-404(1)
	Bronco Shotblast Machine with Baghouse	PM	3.59(P) ^{0.62}	Rule 335-3-404(1)
	Goff, DeLong, and Bronco Shotblast Machines with Baghouse	Opacity	(see general provisos)	Rule 335-3-401(1)

Provisos for Three Shotblast Machines w/ Shared Baghouse

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-401, "Control of Particulate Emissions – Visible Emissions".	
3. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-404, "Control of Particulate Emissions – Process Industries – General".	
4. The Goff Shotblast has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	(Anti-PSD)
5. The Goff Shotblast is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR §64.2
Emission Standards	
1. Visible emissions from these sources shall not exceed the opacity limitations as specified in General Proviso No. 29.	Rule 335-3-401(1)
2. Particulate matter emissions from the Goff Shotblast machine shall not exceed the lesser of the Anti-PSD limit of 15.52 lb/hr	
or the allowable set by ADEM Admin. Code r. 335-3-404(1).	Rule 335-3-404(1)
3. Particulate matter emissions from the Delong Shotblast machine shall not exceed the allowable as set by ADEM Admin. Code r. 335-3-404(1).	` ,
4. Particulate matter emissions from the Bronco Shotblast machine shall not exceed the allowable as set by ADEM Admin. Code r. 335-3-404(1).	()
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60, Appendix A, shall be used in the determination of opacity.	Rule 335-3-105
2. Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-105

Federally Enforceable Provisos	Regulations
Emission Monitoring	
1. Reference Appendix A for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR §64.7
2. The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If the instantaneous opacity of emissions in excess of 10% are noted at any time and are not corrected within a period of 1 hour, then a Method observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	1
3. The facility shall conduct the following weekly inspections:	Rule 335-3-1605(c)
(a) Check hopper, fan, and cleaning cycle for proper operation.	
(b) Perform a visual check of all hoods and ductwork.	
4. The facility shall conduct an annual inspection of the complet baghouse unit. This shall include:	Rule 335-3-1605(c) 40 CFR Part 64
(a) Baghouse structure, access doors, door seals, and bags.	
(b) An internal inspection of the baghouse hoppers.	
5. The facility shall monitor differential pressure of the baghous daily.	40 CFR Part 64
6. The facility shall calibrate the pressure gauge annually. If an erratic or abnormal reading is observed then the instrumen shall be inspected and either calibrated or replaced.	
Recordkeeping and Reporting Requirements	
1. All records shall be maintained in a form suitable fo inspections for a period of at least five years.	Rule 335-3-1605(c)
2. The facility shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken.	
3. If a visible emission observation is required using the 40 CFR Part 60, Appendix A, Method 9, the results should be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documented.	
4. The facility shall record the baghouse pressure daily. An deviations from the pressure range shall be documented along	

Federally Enforceable Provisos	Regulations
with the corrective action and reported to the Department within two (2) working days.	

Summary Page for Thermal Reclamation Unit w/ Shared Baghouse

Permitted Operating

Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
		PM	3.59(P) ^{0.62}	Rule 335-3-404(1)
	Thermal Reclamation Unit with Baghouse	Styrene	N/A	N/A
001		Benzene	N/A	N/A
		HAPs	N/A	N/A
		Opacity	20%/40%	Rule 335-3-401(1)

Provisos for Thermal Reclamation Unit w/ Shared Baghouse

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-401, "Control of Particulate Emissions – Visible Emissions".	
3. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-404, "Control of Particulate Emissions – Process Industries – General".	
Emission Standards	
1. Visible emissions from these sources shall not exceed the opacity limitations as specified in General Proviso No. 29.	Rule 335-3-401(1)
2. Particulate matter emissions from this unit shall not exceed the allowable as set by ADEM Admin. Code r. 335-3-404(1).	Rule 335-3-404(1)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60, Appendix A, shall be used in the determination of opacity.	Rule 335-3-105
2. Method 5 of 40 CFR Part 60, Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-105
Emission Monitoring	
1. The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If the instantaneous opacity of emissions in excess of 10% are noted at any time and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	
2. The facility shall conduct the following weekly inspections:	Rule 335-3-1605(c)
(a) Check hopper, fan, and cleaning cycle for proper operation.	
(b) Perform a visual check of all hoods and ductwork.	
3. The facility shall conduct an annual inspection of the complete	Rule 335-3-1605(c)

Fe	derally Enforceable Provisos	Regulations
	baghouse unit. This shall include:	
	(a) Baghouse structure, access doors, door seals, and bags.	
	(b) An internal inspection of the baghouse hoppers.	
4.	The facility shall monitor differential pressure of the baghouse daily.	Rule 335-3-1605(c)
5.	The facility shall calibrate the pressure gauge annually. If an erratic or abnormal reading is observed then the instrument shall be inspected and either calibrated or replaced.	Rule 335-3-1605(c)
Re	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five years.	Rule 335-3-1605(c)
2.	The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken.	Rule 335-3-1605(c)
3.	If a visible emission observation is required using the 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documented in a form suitable for inspection.	Rule 335-3-1605(c)
4.	The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days.	Rule 335-3-1605(c)

Summary Page for Boiler System

Permitted Operating

Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
		PM	0.5 lb/MMBtu	Rule 335-3-403(1)
	Cleaver-Brooks Steam Boiler	СО	N/A	N/A
003		SO_2	4.0 lb/MMBtu	Rule 335-3-501(1)(b)
		NO_x	N/A	N/A
		Opacity	(see general provisos)	Rule 335-3-401(1)

Provisos for Boiler System

Federally Enforceable Provisos	Regulations	
Applicability		
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits".	Rule 335-3-1603	
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-401, "Control of Particulate Emissions – Visible Emissions".	Rule 335-3-401	
3. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-403, "Control of Particulate Emissions – Fuel Burning Equipment".	Rule 335-3-403	
4. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-501, "Control of Sulfur Compound Emissions – Fuel Combustion".	Rule 335-3-501	
5. This source is subject to the applicable requirements of 40 CFR	Rule 335-3-1106(108)	
Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters".	40 CFR §63.7585	
6. This source is subject to the applicable requirements of 40 CFR	Rule 335-3-1106(1)	
Part 63, Subpart A, "General Provisions", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565	
Emission Standards		
1. Visible emissions from these sources shall not exceed the opacity limitations as specified in General Proviso No. 29.	Rule 335-3-401(1)	
2. Particulate matter emissions from this source shall not exceed 0.5 lb/MMBtu.	Rule 335-3-403(1)	
3. Sulfur dioxide emissions from this source shall not exceed 4.0 lb/MMBtu.	Rule 335-3-501(1)(b)	
4. The Permittee must operate and maintain these sources, at all times, in a manner consistent with safety and good air pollution control practices for minimizing emissions.	40 CFR §63.7500(a)(3)	
Compliance and Performance Test Methods and Procedures		
1. Method 9 of 40 CFR Part 60, Appendix A shall be used in the determination of opacity.	Rule 335-3-105	
2. Method 5 of 40 CFR Part 60, Appendix A, shall be used in the determination of particulate matter emissions.	Rule 335-3-105	

Fe	derally Enforceable Provisos	Regulations
3.	Method 6 of 40 CFR Part 60, Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-105
En	nission Monitoring	
1.	The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If the instantaneous opacity of emissions in excess of 10% are noted at any time and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-1605(c)
2.	The facility must conduct biennial tune-ups of the boiler based on the requirements in 40 CFR §63.7540(a)(10)(i) through §63.7540(a)(10)(vi). If a boiler is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.	40 CFR §63.7540(a)(11) 40 CFR §63.7540(a)(13)
Re	cordkeeping and Reporting Requirements	
1.	All records shall be maintained in a form suitable for inspection for a period of at least five years.	Rule 335-3-1605(c)
2.	The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken.	Rule 335-3-1605(c)
3.	If a visible emission observation is required using the 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documented in a form suitable for inspection.	Rule 335-3-1605(c)
4.	The facility shall maintain a record of all biennual tune-ups available on request. These records shall contain the following information:	Rule 335-3-1605(c) 40 CFR §63.7540(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.	
	(b) A description of any corrective actions taken as a part of the tune-up.	
5.	If the facility intends to use a fuel other than natural gas to fire this boiler unit during a period of natural gas curtailment or supply interruption, as defined in §63.7575, you must submit a	40 CFR §63.7545(f)

Federally Enforceable Provisos	Regulations
notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption.	
6. The facility shall submit a biennial compliance report as required by §63.7550(b).	40 CFR §63.7550(b)

Appendix A: Compliance Assurance Monitoring (CAM)

I. Indicator	Differential Pressure	Visible Emission
II. Measurement Approach	Measured using a Magnehelic Differential Pressure Gauge	Visual inspection of the baghouse stack
III. Indicator Range	While the unit is operation, an excursion is defined as a pressure differential below 2.0 inches of H ₂ O or greater than 7.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	Baghouse stack visual emission opacity should be less than 5%. Excursions of opacity shall not exceed 10% for more than 4 hrs. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of one hour, then a method 9 must be performed with four hours of the observation.
IV. Performance Criteria		
Data Representativeness	The pressure gauge measures the pressure differential between the inlet and outlet of the baghouse.	Baghouse shell is visually inspected for deterioration. If needed, it is repaired or replaced. Broken or leaking filter bags are replaced.
Verification of Operation Status	Not applicable	Not applicable
QA/QC Practices and Criteria	The pressure gauge shall be calibrated annually. If abnormal pressure is found, the gauge shall be inspected and corrected or replaced.	Opacity readings shall be taken by a person fully trained and qualified according to EPA standards. Gauge calibration shall be conducted when erratic reading are displayed, or at least annually.
Monitoring Frequency	The pressure differential shall be monitored and logged daily.	The complete Baghouse Unit shall be inspected at least annually. The visual emission shall be performed daily.
Data Collection Procedures	The pressure differential will be recorded with the time, date, and name of the observer.	A record of the results of the Baghouse inspection shall be kept with the time, date, bags condition and number replaced.
Averaging Period	Instantaneous	Instantaneous