



## SYNTHETIC MINOR OPERATING PERMIT

- PERMITTEE: HIKAE ALUMINUM PROCESSING, L.L.C.
- FACILITY NAME: HIKAE ALUMINUM PROCESSING
- LOCATION: ASHLAND, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
410-0041-X002	Saturn Shear Shredder with Wet Suppression
	Crushing & Screening Operations with Baghouse, comprised of:
	Jaw Crusher, Impact Crusher, and Screen

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.

**ISSUANCE DATE:** Draft

Alabama Department of Environmental Management

Page 1 of 6

- 1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
- 2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
- 3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
- 4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
- 5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
- 6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shutdown as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
- 7. This process, including all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
- 8. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
- 9. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

- 10. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
- 11. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
- 12. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
- 13. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter.

- a. 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.
- b. 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 procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 60 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

- 14. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
- 15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions

shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

16. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

- a. 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;
- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- c. by paving;
- d. by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

- 17. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
- 18. 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.
- 19. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 20. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
- 21. Aluminum scrap feed throughput to the shredder shall be limited to 54,330 tons per rolling 12month period.
- 22. Throughput to the crushing and screening process shall be limited to 40,166 tons per rolling 12-month period.
- 23. The shredding crushing and screening process shall be limited to operating no more than 5,433 hours per rolling 12-month period.

## Provisos

- 24. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), except for one 6-minute period during any 60-minute period, no source shall discharge into the atmosphere particulate that results in an opacity greater than 20%, as determined by a 6-minute average. At no time shall sources discharge into the atmosphere particulate that results in an opacity greater than 40%, as determined by a 6-minute average. Opacity shall be determined by 40 CFR Part 60, Appendix A-4, Method 9.
- 25. In accordance with ADEM Admin. Code. r. 335-3-4-.04(1), particulate matter, in pounds per hour, shall not be emitted from a process in excess of  $3.59P^{0.62}$ , where *P* is the process weight per hour in tons per hour.
- 26. At no time shall particulate matter (PM) emissions from the crushing & screening operations exceed 4.28 pounds per hour. PM emissions shall be determined by 40 CFR Part 60, Appendix A-3, Method 5.
- 27. The Saturn Shear Shredder shall only operate using a wet suppression system sufficient to control particulate matter emissions from the shredder.
- 28. Pressure drop across the baghouse shall not exceed the manufacturer's specifications.
- 29. The weight of throughput/feed to the shredder and crushing and screening operations shall be recorded. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.
- 30. The hours of operation of the shredder and crushing and screening operations shall be recorded. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years
- 31. Periodic inspections of the crushing & screening operations baghouse shall be performed while in operation as follows to verify proper operation:
  - a. Once per day, monitor and record pressure drop across baghouse to determine that it is within manufacturer's specifications.
  - b. Once per week, perform a check of visible emissions from the baghouse stack. If visible emissions are observed, the Permittee shall conduct a visible emissions observation in accordance with the following:
    - i. The observation shall be at least 6 minutes in length.
    - ii. The observation shall be conducted by a certified observer in accordance with 40 CFR Part 60, Appendix A-4, Method 9.
    - iii. If visible emissions are noted, the Permittee shall take appropriate actions as necessary to eliminate the observed emissions.
    - iv. If at any time emissions in excess of 10% instantaneous opacity are noted, an additional observation shall be performed as described above.

- c. Once per week, check hopper, fan, and cleaning cycle for proper operation.
- d. Once per month, perform a visual check of all hoods and ductwork.
- e. Record any repairs or observed problems.
- 32. The Permittee shall maintain a record of all inspections and monitoring required by this permit. This shall include all problems observed and corrective actions taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.
- 33. A deviation report must be submitted within 60 days of the end of each semiannual calendar reporting period. The report shall include a summary of each deviation from any permit requirement that occurred during the reporting period along with corrective actions taken. When no deviations of parameters have occurred, the report must state that no deviation occurred during the reporting period.

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## SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: HIKAE ALUMINUM PROCESSING, L.L.C.

FACILITY NAME: HIKAE ALUMINUM PROCESSING

LOCATION: ASHVILLE, ALABAMA

## PERMIT NUMBER DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE

410-0041-X003

25-ton Aluminum Melting Rotary Furnace with Baghouse

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.

**ISSUANCE DATE: DRAFT** 

Alabama Department of Environmental Management

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- b. by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
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- 17. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
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- 21. In accordance with ADEM Admin. Code. r. 335-3-4-.01(1), except for one 6-minute period during any 60-minute period, no source shall discharge into the atmosphere particulate that results in an opacity greater than 20%, as determined by a 6-minute average. At no time shall sources discharge into the atmosphere particulate that results in an opacity greater than 40%, as determined by a 6-minute average. Opacity shall be determined by 40 CFR Part 60, Appendix A-4, Method 9.

- 22. The secondary aluminum processing unit is subject to 40 CFR 63 Subpart RRR, "National Emission Standards for Hazardous air Pollutants for Secondary Aluminum Production."
- 23. At no time shall emissions from the furnace exceed:
  - a.  $2.1 \times 10^{-4}$  grains of dioxins & furans expressed as toxic equivalents (D/F TEQ) per ton of charge/feed per furnace
  - b. 3.50 pounds of hydrochloric acid (HCl) per hour
  - c. 6.00 pounds of total particulate matter (PM) per hour
- 24. Aluminum scrap feed rate to the furnace shall be limited to 37,110 tons per rolling 12-month period.
- 25. The furnace shall be limited to operating no more than 5,433 hours per rolling 12-month period.
- 26. The furnace shall meet the operating requirements of 40 CFR 63.1506:
  - a. A capture/collection system or fume hood that vents captured emissions to the baghouse shall be installed according to ACGIH guidelines and operated according to the OM&M plan.
  - b. The total reactive chlorine flux injection rate (TRFIR) as defined in 40 CFR 63.1503 shall not exceed the rate established during the most recent performance test.
  - c. The weight of charge/feed during each operating cycle or time period used in the performance test shall not exceed more than 10% higher than the rate established during the most recent performance test, to show compliance with the SMOP limits of Provisos 23(b)-(d).
  - d. A weight measurement system shall be operated in accordance with the OM&M plan to determine the weight of <u>charge/feed</u> and <u>flux</u> added during each operating cycle or time period used in the performance test.
  - e. An easily visible label shall be posted identifying the furnace, the operating parameter ranges, and other requirements incorporated into the OM&M plan per 40 CFR 63.1506(b).
- 27. The baghouse shall meet the operating requirements of 40 CFR 63.1506:
  - a. A bag leak detection system shall be operated concurrently with the baghouse and in accordance with the manufacturer's operating instructions. Corrective actions must be initiated within one hour of a system alarm according to the procedures within the OM&M plan. System alarms may not account for more than 5 percent of the operating time during a 6-month block reporting period, per 40 CFR 63.1506(m)(1).

- b. In accordance with the OM&M plan, the 3-hour block average inlet temperature for the baghouse shall be maintained at or below the average temperature established during the most recent performance test, plus 25 °F.
- c. Free-flowing lime shall be maintained in the hopper to the lime injection system, and the lime feedrate shall be maintained at or above the level established during the most recent performance test.

28. The furnace shall meet the monitoring requirements of 40 CFR 63.1510:

- a. The capture/collection system or fume hood that vents captured emissions to the baghouse shall be inspected at least once each calendar year according to the methods and requirements of 40 CFR 63.1510(d). Inspection includes volumetric flow rate measurements or verification of a permanent total enclosure using EPA Method 204.
- b. The weight measurement system shall be maintained and calibrated  $\pm 1$  percent error according to the schedule specified by the manufacturer (or, if no calibration schedule is specified, at least once every 6 months).
- c. The total reactive chlorine flux injection rate shall be calculated and recorded for each operating cycle or time period used in the most recent performance test.
- 29. The baghouse shall meet the monitoring requirements of 40 CFR 63.1510:
  - a. The bag leak detection system shall be installed, for each filter fabric exhaust stack according to the specifications of 40 CFR 63.1510(f)(1), calibrated, operated and maintained according to the manufacturer's instructions, and equipped with a device to continuously record the output signal from the sensor.
  - b. The bag leak detection system must be certified by the manufacturer to be capable of detecting Particulate Matter emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less and must provide output of relative or absolute PM loadings.
  - c. The bag leak detection system must be equipped with an easily heard, audible alarm that will sound automatically when an increase in relative PM emissions over a preset level is detected.
  - d. Once the bag leak detection system baseline is established, the Permittee must not adjust the sensitivity or range, averaging period, alarm set points or alarm delay except as detailed in the OM&M plan. At no time may the sensitivity be increased by more than 100 percent or decreased by more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.
  - e. A device to continuously monitor and record the temperature of the inlet baghouse gasses shall be installed according to 40 CFR 63.1510(h). It must record the temperature in 15-minute block averages and calculate the average temperature for each 3-hour block period

and must include a range from 0 to 1.5 times the average temperature established during the most recent performance test.

- f. The lime injection system shall be verified to be free-flowing by inspecting the feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period.
- g. The lime injection system feed setting shall be checked at least once per day.
- h. The lime injection system rate, in pounds per hour, shall be verified at least once per month, to be no less than 90 percent of the lime injection rate established during the most recent performance test. If determined to be below 90 percent of the rate established during the most recent performance test, either the feeder must be repaired, or the feed setting shall be adjusted to restore the rate to normal operation within 45 days according to 40 CFR 63.1510(i)(4).
- 30. The operation, maintenance, and monitoring plan (OM&M), or revisions thereto, shall be submitted to the Department within 90 days after the initial performance test or any subsequent performance test, if successful, and shall contain the following, as applicable:
  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, for each furnace and the baghouse.
  - b. A monitoring schedule for the secondary aluminum processing unit.
  - c. Procedures for the proper operation and maintenance of each furnace and the baghouse.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including calibration and certification of accuracy of each monitoring device, semiannually, according to the manufacturer's instructions.
  - e. Procedures for monitoring process and control device parameters, including lime injection rates, charge and flux feed rates, and baghouse differential pressure.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the range established per 40 CFR 63.1510(b)(6).
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits.
- 31. Performance tests to show compliance with the emission limits of Proviso 23 shall be conducted as follows:

- a. The initial performance test shall be conducted within 180 days of commencing operation.
- b. Periodic performance tests shall be conducted at least once every 5 years (60 months) following the initial performance test.
- c. Each performance test must consist of three separate runs. Pollutant sampling for each run must be conducted over the entire process operating cycle. Additionally, where the length of the process operating cycle is not known in advance, and where isokinetic sampling must be conducted based on the procedures in Method 5 in appendix A to part 60, use the procedure specified in 40 CFR 63.1511(b)(3) to ensure that sampling is conducted over the entire process operating cycle.
- d. Performance tests must be conducted under representative conditions expected to produce the highest level of HAP emissions (considering the extent of feed/charge contamination, reactive flux addition rate and feed/charge rate).
- e. The following methods in 40 CFR Part 60, Appendix A shall be used:
  - i. Method 5 for PM
  - ii. Method 9 for visible emission observations
  - iii. Method 23 for D/F
  - iv. Method 26A (Alt 26) for HCl.
- f. The following operating parameters shall be established:
  - i. Baghouse inlet gas temperature, per 40 CFR 63.1512(n)
  - ii. Total reactive chorine flux injection rate, per 40 CFR 63.1512(o)
  - iii. Lime injection feed rate, per 40 CFR 63.1512(p)
  - iv. Charge/feed rate
- g. The results of any performance test shall be submitted within 60 days of the test.
- 32. Visible emissions observations shall be performed as follows on both the baghouse stack and the furnace building and furnace building roof vent:
  - a. An observation shall be performed at least once per day when the furnace is operating.
  - b. Each observation shall be at least 6 minutes in length.
  - c. Each observation shall be conducted by a certified observer in accordance with 40 CFR Part 60, Appendix A, Method 9.

- d. If excess visible emissions are noted, the Permittee shall take appropriate actions as necessary to eliminate the observed emissions according to the OM&M plan.
- e. If at any time emissions in excess of 10% instantaneous opacity are noted, an additional observation shall be performed.
- 33. The following records shall be kept in a form suitable for inspection for at least five (5) years:
  - a. Records shall be kept documenting the total operating hours for the furnace during each six-month period, each bag leak alarm, the type of alarm, the time corrective action was initiated and completed, and a brief description of the cause and corrective action.
  - b. Records shall be kept documenting the 15-minute block average inlet temperatures for each lime-injected fabric filter, including any period when the 3-hour block average temperature exceeds the compliant operating parameter value +14 °C (+ 25 °F), with a brief explanation of the cause of the excursion and the corrective action taken.
  - c. Records shall be kept documenting the inspections verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken.
  - d. Records shall be kept documenting the daily inspections of the lime feeder setting and monthly verifications of lime flow rate, including records of any deviation of the feeder setting from the setting used in the most recent performance test, with a brief explanation of the cause of the deviation and the corrective action taken.
  - e. Records shall be kept documenting the total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid, or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
  - f. Records shall be kept documenting the feed/charge and solid flux weights for each operating cycle or time period used in the performance test.
  - g. Records shall be kept documenting the monthly inspections for proper unit labeling for each furnace subject to labeling requirements.
  - h. Records shall be kept documenting the annual inspections of emission capture/collection and closed vent systems or, if the alternative to the annual flow rate measurements is used, records of differential pressure; fan RPM or fan motor amperage; static pressure measurements; or duct centerline velocity using a hotwire anemometer, ultrasonic flow meter, cross-duct pressure differential sensor, venturi pressure differential monitoring or orifice plate equipped with an associated thermocouple, as applicable.
  - i. A current copy of the OM&M plan.
  - j. For any failure to meet an applicable standard, the following records shall be kept:

- i. Records of the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken.
- ii. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.1506(a)(5), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- k. Records of each visible emissions observation shall be kept documenting the time, duration, conditions, reading, observer, and corrective actions taken.
- 34. An excess emissions/summary report must be submitted according to the requirements of 40 CFR 63.10(e)(3) within 60 days of the end of each semiannual calendar reporting period.
  - a. The following information must be included, if any occurred, during that reporting period.
    - i. The corrective action for the bag leak detection system if not initiated within one hour.
    - ii. An excursion of a compliant process or operating parameter or range (e.g. lime injection rate, flux injection rate) occurred.
    - iii. An affected source was not operated according to 40 CFR 63 Subpart RRR.
    - iv. When no deviations of parameters have occurred, the report must state that "no excess emissions occurred during the reporting period".
  - b. Each report must include the applicable certifications of 40 CFR 63.1516(b)(2).
  - c. Each report must include summaries of malfunctions in accordance with 40 CFR 63.1516(d).