

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: HIKAE ALUMINUM PROCESSING, L.L.C.
FACILITY NAME: HIKAE ALUMINUM PROCESSING
LOCATION: ASHVILLE, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE, OR DEVICE
410-0041-X004	Mobile Hammer Mill Shredder with 760 HP Diesel Engine.

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§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

HIKAE ALUMINUM PROCESSING, LLC
ASHVILLE, ALABAMA
(PERMIT NO. 410-0041-X002)
PROVISOS

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. 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.
5. 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 **that exceed 1 hour** 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.
6. In the event there is a breakdown of air pollution control or process equipment in such a manner as to cause increased emission of air contaminants for a period greater than **1 hour**, the person responsible for such equipment shall notify the Air Division within 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected.
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

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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. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 30 working days of completion of testing.

Particulates	()	Carbon Monoxide	()
Sulfur Dioxide	()	Nitrogen Oxides	()
Volatile Organic Compounds	()	Visible Emissions	()

11. 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.
12. 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.
13. 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.
14. 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.
15. 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.

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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 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

16. Records will be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the process equipment and any malfunction of the air pollution control equipment. These records will be kept in a permanent form suitable for inspection and will be retained for at least two years following the date of each occurrence.
17. 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.

18. If this plant relocates to another site, this plant's Air Permit remains valid for this site unless or until it is revoked for failure to comply with ADEM Air Division Rules and Regulations. The owner or operator of this plant must provide written notification of the intent to relocate the plant to this site at least two weeks in advance. The written notification should include the planned construction beginning date and the projected startup date. Failure to provide this written notification is a violation of this permit condition and is grounds for revocation of this permit.
19. 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.
20. Compliance with the opacity standards will be determined by conducting visible emission observations in accordance with EPA Reference Method 9 of Appendix A-4 of the CFR,

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Title 40, Part 60 (7-1-2023, Edition). If required, the minimum time of observation of each source will be 3 hours (30 six-minute averages), which may be broken into several shorter time frames (i.e., three (3) 60-minute observations of ten (10) 6-minute averages each). The observations will be made by an observer currently certified to make EPA Method 9 visible emission observations.

21. 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.
22. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
23. 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.
24. These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01(1), "*Control of Particulate Emissions – Visible Emissions*".
25. These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.04(1), "*Control of Particulate Emissions – Process Industries – General*".
26. In accordance with ADEM Admin. Code r. 335-3-4-.01(1), no person shall discharge into the atmosphere from any source of emission, particulate of an opacity greater than 20%, as determined by a 6-minute average. However, during one 6-minute period in any 60-minute period, a person may discharge into the atmosphere from any source of emission, particulate of an opacity greater than 40%.
27. In accordance ADEM Admin. Code r. 335-3-4-.04(1), no person shall cause the emission of particulate matter in excess of $E=17.31P^{0.16}$, where:
E = Particulate Matter emissions, in pounds per hour
P = Process weight per hour, in tons per hour
28. Feed/throughput to the mobile Hammer Mill shredder shall be limited to 80,000 tons during any consecutive (rolling) 12-month period.
29. The mobile Hammer Mill shredder shall be limited to operating no more than 2,000 hours during any consecutive (rolling) 12-month period.
30. The Permittee shall install and maintain a non-resettable hour meter on the mobile Hammer Mill that records the hour of operation of the mobile Hammer Mill shredder.
31. The permittee shall perform daily inspections of the mobile Hammer Mill shredder unit to verify proper operation. The following activities shall be performed if the unit is operating:
 - (a) Once per day perform a check of visual emissions from each unit.
 - (b) If visible emissions are noted, the Permittee shall perform a visible emissions observation in accordance with Method 9 and take appropriate actions necessary to

eliminate the observed emissions immediately, followed by an additional observation to confirm that emissions are reduced to normal.

32. Record any repairs or observed problems in a form suitable for inspection.
33. Daily records of hours of operation of the mobile Hammer Mill shredder engine must be recorded through the non-resettable and kept in permanent form suitable for inspection. The records shall be retained for at least five years and made available upon request.
34. Records including the dates and times, of all visible emissions observations results, inspections, corrective actions taken, and emission related maintenance performed on the mobile Hammer Mill shredder shall be maintained and be made available for inspection for at least five (5) years form the date of generation of each record.
35. 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.

DRAFT

Date