

Statement of Basis For Title V Permit

Company Name	Kaiser Aluminum	
Premise Number	01-45-01-0093	
Number of Non-insignificant Emissions Units	6	(emissions units: B019, B020, P005, P006, P007, P020)
What makes this facility a Title V facility?	Potential-to-emit for nitrogen oxides.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes.	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Operational - Facility-wide HAP emissions (hydrogen chloride, hydrogen flouride, chlorine and HAP metals) are limited to less than major source threshold of 10 tpy for each HAP and 25 tpy for combination of HAPs		N	Federally enforceable limits to support exemption from the major source requirements of the applicable MACT - "Secondary Aluminum" - 40CFR63, Subpart RRR sections.
Operational - hydrogen chloride emissions from P005, P006, P007 and P020 shall not exceed 9.9 tons per year per rolling 12 month.		N	Federally enforceable limits to support exemption from the major source requirements of the applicable MACT - "Secondary Aluminum" - 40CFR63, Subpart RRR sections.

<p>Operational - annual chlorine usage for P005, P006, P007 and P020 combined shall not exceed 12.86 tons based upon a rolling, 12-month summation of the monthly chlorine usage</p>		<p>N</p>	<p>Federally enforceable limits to support exemption from the major source requirements of the applicable MACT - "Secondary Aluminum" - 40CFR63, Subpart RRR based on dividing 9.9 tpy by emission factor of 0.77 ton of HCL per ton of chlorine used (derived from stack test).</p>
<p>Operational - permittee must not discharge to the atmosphere any 3-day, 24-hour rolling average emissions of dioxans/furans (D/F) in excess of equation 3 of 40CFR63.1505(k)(3); or the permittee may demonstrate compliance with the emission limits of 40CFR63.1505(k)(3) by demonstrating that each emissions unit (P005, P006, P007 and P020) is in compliance with the emission limit of 15.0 ug of D/F TEQ per Mg (2.1E-04 gr of D/F TEQ per ton) of feed/charge as specified in 40CFR63.1505(i)(3).</p>		<p>Y</p>	<p>Requirement of 40CFR63, Subpart RRR since the permittee does not use clean charge.</p>
<p>Operational - Per 40CFR63.1506(a), on and after the date on which the initial performance test is conducted or required to be conducted, whichever date is earlier, the permittee must operate all new and existing affected sources and control equipment according to the requirements of 40CFR63.1506. The completion of the initial performance tests for SAPUs shall be considered to be the date of approval of the OM&M plan by the Director (the appropriate Ohio EPA District Office or local air agency).</p>		<p>Y</p>	<p>Requirement of 40CFR63, Subpart RRR to ensure compliance with D/F limitation.</p>

Operation, Maintenance and Monitoring Plan (OM&M)		Y	Requirement of 40CFR63, Subpart RRR to ensure compliance with D/F limitation.
Recordkeeping - Calculate and record the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit on a daily basis		Y	Requirement of 40CFR63, Subpart RRR to ensure compliance with D/F limitation.
ET - Initial Performance Test		Y	Requirement of 40CFR63, Subpart RRR to demonstrate compliance with D/F limitation and to establish operating parameters that will ensure ongoing compliance with the D/F limitation.
Reporting - Initial Notification		Y	Per 40CFR63, Subpart RRR.
Recordkeeping - General records		Y	General record keeping requirements for emissions unit (EU) subject to 40CFR63.
Recordkeeping - maintain monthly records of chlorine usage		N	Compliance with 12 month rolling emission limitation of HCl to avoid 40CFR63, Subpart RRR major source requirements.
Reporting - startup, shutdown and malfunction plan		Y	Plan for operating and maintaining the EUs to ensure compliance with 40CFR63, Subpart RRR.
Reporting - semiannual reports		Y	Report deviations from limit in applicable MACT.
Reporting - excursion reports		N	Report deviations from chlorine usage limitation.
Testing - Annual compliance certification		Y	Certification of continuous compliance with D/F limitation.
MACT Equations - to determine compliance with the D/F emission limits for the SAPU.		Y	To determine compliance with the D/F emission limits for the SAPU.

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Othe r							
P005 P006 P007 P020	20% opacity, as a 6-minute average	17-07 (A)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. ET - Compliance shall be demonstrated through visible emissions observations.
B019 B020	0.5 lb particulates /hr and 2.1 tons/yr; .01 lb SO2/hr and .06 ton/y; 2.4 lbs Nox/hr and 10.5 tons/yr; .13 lb VOC/hr and .6 ton/yr; 2.0 lbs CO/hr and 8.8 tons/yr	31-05(A)(3)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas in this emissions unit. ET - Compliance may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit by the applicable AP-42 emission factor for natural gas. All of the emissions from this fugitive operation result from the burning of natural gas.
B019 B020	10% opacity, as a 3-minute average	31-05(A)(3)	N	Y	Y	Y	Y	Y	N	ET - Compliance shall be demonstrated through visible emissions observations.
P005 P006 P007 P020	18.7 lbs particulate/hr	17-11(B)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).
P005 P006 P007 P020	Dioxan/furan (D/F) emissions shall not exceed 15.0 ug of D/F TEQ per Mg (2.1E-04 gr of D/F TEQ per ton) of feed/charge	40CFR63.1505 (i)(3)	N	Y	Y	Y	Y	Y	Y	OR - 40CFR63.1506 Misc - Per 40CFR63.1513(b), compliance with the D/F standard shall be demonstrated using Equation 7 of 40CFR63.1513. To convert D/F measurements to TEQ units, the permittee must use the procedures and equations in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), incorporated by reference in 40CFR63.1502, available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia, NTIS no. PB 90-145756.

P005 P006 P007 P020	OAC 3745-31- 05(A)(3) PTI 01-038 PTI 01-190 PTI 01-205	Compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11.	N	N	N	N	N	N	N	Same as the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11 above.
------------------------------	---	--	---	---	---	---	---	---	---	--

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.