

ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 1659-AOP-R1

IS ISSUED TO:

Alumax Foils, Inc.
777 Tyler Road
Russellville, AR 72802
Pope County
CSN: 58-0272

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

May 30, 2000 and May 29, 2005

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

September 16, 2002
Date Amended

SECTION I: FACILITY INFORMATION

PERMITTEE: Alumax Foils, Inc.
CSN: 58-0272
PERMIT NUMBER: 1659-AOP-R1

FACILITY ADDRESS: 777 Tyler Road
Russellville, AR 72802

COUNTY: Pope

CONTACT POSITION: Jeffrey Klunk
TELEPHONE NUMBER: (314)832-9601

REVIEWING ENGINEER: Charles Hurt

UTM North-South (Y): Zone 15 [3903.0]
UTM East-West (X): Zone 15 [492.3]

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION II: INTRODUCTION

Summary of Permit Activity

Alumax Foils, Inc. owns and operates an aluminum foil rolling mill located at 777 Tyler Road in Russellville. This facility receives cast aluminum foil from an Alumax facility in St. Louis and converts it to aluminum foil to be used primarily in packaging applications. The permit revisions are due to a permit appeal resolution (PAR). The PAR became effective August 15, 2002 and addressed the revision of testing time requirements for Specific Conditions #12 and Specific Condition #24. Also "Safety-Kleen" has been removed from the process description for SN-128.

Process Description

Cold Mill

Cast metal coil is received by the cold mill to be rolled to the initial gauge for further processing. Cold rolling is used in the initial stages of foil manufacturing to reduce the thickness of the cast sheet to a gauge sufficient for introduction into the foil mill. Cold rolling is performed at metal temperatures below 265E F and at speeds of up to 2000 to 3000 feet per minute. Cold rolling is used to produce light gauge aluminum sheet. Aluminum sheet is cold rolled on a four-high rolling mill. The four steel rolls are stacked vertically which allows the aluminum to move horizontally between the rolls. The cold mill is equipped with a hooding system that discharges particulate matter to a cyclonic separator. The roll force is applied perpendicular to the surface of the aluminum sheet. Deformation occurs in two dimensions so that the metal is flattened and elongated. Rolling lubricant cools the rolls by controlling the friction between the metal strip and the work rolls. Heat is transferred from the rolls to the oil by direct contact. Lubricant overflow from the rolls is collected, filtered, cooled or heated, and recycled back to the mill.

Sheet Annealing

Sheet annealing is a process that can occur in between passes on the cold mill or at the end of a production run on the cold mill. The annealing process occurs in a gas fired oven with an inert atmosphere. Inputs to this process are the rolled aluminum sheet and natural gas from the burners. Inert gas (nitrogen) is generated by an inert gas generator which uses controlled combustion to consume the oxygen to generate a nitrogen atmosphere for the ovens. Two sheet annealing ovens are associated with this process.

Foil Mill

Metal that has been processed by the cold mill is transferred to the foil mill for finishing. The

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

metal is rolled in a manner similar to the cold mill but at higher speeds. A lubricant is applied by sprays to the sheet and the work rolls to reduce heat. The mill is provided with equipment for handling and coiling the process metal. Lubricant overflow from the operation is collected, filtered, cooled or heated, and recycled back to the process. Metal rolled in this process can go through a series of anneals to impart the proper metal properties required by the customer. Annealing can occur at any time in the process or can occur at the end of the process.

Finish Annealing

Finish annealing is a process that occurs between passes on the foil mill or at the end of a production run on the mill. This process is similar to the sheet anneal but the cycles may be longer and the temperatures lower than the sheet anneals. Inputs to this process are rolled aluminum foil and natural gas for the burners. Inert gas (nitrogen) is generated by an inert gas generator which uses controlled combustion to consume oxygen to generate a nitrogen atmosphere for use in one of the three finish annealing ovens.

Bail Oven

The electric bail oven is a vacuum oven which uses heat under vacuum to dry saturated bails of scrap collected by the trim system on the rolling mills. Oil is driven off under vacuum and collected for recycling.

Separator

The separator system is used to separate the sheets of foil that come from the foil mill and put them into smaller coils or rolls that are easier to handle. Some trimming of the sheet may occur at this process and the trim is collected by the dry trim cyclone and baled as scrap.

Trim Systems (wet and dry)

The trim systems collect the trimmed material from the sheet that is handled by the foil mill (wet) and the separator (dry). The trim systems use a cyclone to collect the material and discharge it to a bailer.

Tank Farm

The tank farm consists of seven bulk storage tanks that store virgin, waste, and recycled rolling oil lubricants.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

Vacuum Distillation

The plant has two vacuum distillation units for the recycling of the recovered rolling oil lubricants. One distillation unit is dedicated to recovering oil from the cold mill while the other recovers oil from the foil mill.

Regulations

This facility is subject to the applicable provisions of the *Arkansas Air Pollution Control Code* (Regulation 18), *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19), *Regulations of the Arkansas Operating Air Permit Program* (Regulation 26), and 40 CFR 60 Subpart Kb- *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.*

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	21.2	91.4	
		PM ₁₀	21.2	91.4	
		SO ₂	0.8	0.8	
		VOC	69.7	245.0	
		CO	2.9	11.5	
		NO _x	4.2	18.8	
18	Bail Oven	VOC	0.1	0.1	12
20A	Cold Mil	PM	10.3	45.1	13
		PM ₁₀	10.3	45.1	
		VOC	4.5	19.7	
20B, 22B, &128	Cold Mill and Intermediate Mill	VOC	19.8	86.7	13

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
22 A	Finished Foil Mill and Regenerative Catalytic Oxidizer	PM	6.2	27.2	13
		PM ₁₀	6.2	27.2	
		SO ₂	0.1	0.1	
		VOC	8.0	35.0	
		CO	0.5	2.1	
		NO _x	0.8	3.5	
30	Dry Trim System Bailer Cyclone	PM	1.0	4.4	17
		PM ₁₀	1.0	4.4	
40	Sheet Annealer #10	PM	0.2	0.7	19
		PM ₁₀	0.2	0.7	
		SO ₂	0.1	0.1	
		VOC	9.9	36.1	
		CO	0.4	1.6	
		NO _x	0.6	2.7	
41	Sheet Annealer #11	PM	0.2	0.7	19
		PM ₁₀	0.2	0.7	
		SO ₂	0.1	0.1	
		VOC	9.9	36.1	
		CO	0.4	1.6	
		NO _x	0.6	2.7	
45	Exothermic Gas Generator	PM	0.1	0.1	22
		PM ₁₀	0.1	0.1	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.2	0.7	
		NO _x	0.2	0.9	

Alumax Foils, Inc.
 Permit #: 1659-AOP-R1
 CSN #: 58-0272

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
50	Finish Annealer #40	PM	0.1	0.4	19
		PM ₁₀	0.1	0.4	
		SO ₂	0.1	0.1	
		VOC	1.9	8.3	
		CO	0.4	1.6	
		NO _x	0.6	2.7	
51	Finish Annealer #41	PM	0.1	0.4	19
		PM ₁₀	0.1	0.4	
		SO ₂	0.1	0.1	
		VOC	1.9	8.3	
		CO	0.4	1.6	
		NO _x	0.6	2.7	
52	Finish Annealer #42	PM	0.1	0.4	19
		PM ₁₀	0.1	0.4	
		SO ₂	0.1	0.1	
		VOC	1.9	8.3	
		CO	0.4	1.6	
		NO _x	0.6	2.7	
58	Exothermic Gas Generator	PM	0.1	0.1	22
		PM ₁₀	0.1	0.1	
		SO ₂	0.1	0.1	
		VOC	0.1	0.1	
		CO	0.2	0.7	
		NO _x	0.2	0.9	
61	Wet Trim System Bailer	PM	1.0	4.4	24
		PM ₁₀	1.0	4.4	
		VOC	1.2	5.1	
70 A	Rolling Oil Unloading Station	Insignificant Activity			38

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

EMISSION SUMMARY					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
70 B	Rolling Oil Unloading Station	Insignificant Activity			38
71	Tank- Virgin 140 Oil	VOC	0.6	0.1	26
72	Tank- Virgin MSO	VOC	0.6	0.1	26
73	Tank-Used MSO	VOC	0.6	0.1	26
74	Tank-Virgin 140 Oil	VOC	0.6	0.1	26
75	Tank- Used Oil/Water	VOC	0.6	0.1	26
76	Tank- Used 140 Oil	VOC	0.6	0.1	26
77	Tank-Used MSO and 140 oil (fuel)	VOC	0.6	0.1	26
80,81,82	140 Oil Distillation Unit	Insignificant Activity			38
83,84,85	MSO Oil Distillation Unit	Insignificant Activity			38
90	Tank- Rolling Oil	VOC	0.6	0.1	26
91	Tank- Rolling Oil	VOC	0.6	0.1	26
92	Tank- Rolling Oil	VOC	0.6	0.1	26
93	Tank- Rolling Oil	VOC	0.6	0.1	26
129	Cooling Tower	PM PM ₁₀	1.8 1.8	7.5 7.5	29

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION III: PERMIT HISTORY

Permit #1659-AOP-R1 was issued to Alumax Foils, Inc. on March 28, 2002. The modification addressed record keeping issues for both natural gas and rolling oil usage. Every natural gas burning source had its emissions calculated based on the source operating at capacity to eliminate natural gas record keeping requirements. The facility also proposed increased emissions due to increased oil throughput in order to address exceedances of previous rolling oil throughput limits. The increased throughput limits will also allow the facility to increase production with the existing process equipment.

Permit #1659-AOP-R0 was issued to Alumax Foils, Inc. on May 30, 2000. This is the first permit issued to Alumax Foils, Inc. under Regulation 26, Regulation of the Arkansas Operation Air Permit Program. Some permitted emission limits were revised based on tests conducted since the issuance of the original permit.

Permit #1659-A was issued to Alumax Foils, Inc. on March 26, 1996. This facility was not constructed or operating prior to the issuance of this permit.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION IV: EMISSION UNIT INFORMATION

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-18
Bail Oven

Source Description

Source SN-18 is used to remove tramp oil from bails of aluminum scrap generated at the facility. The oven is electrically heated and operates under a vacuum to remove the oil. Evaporated oil is condensed and collected for further processing.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition will be demonstrated by operating the condenser on the oven while processing aluminum scrap.

Pollutant	lb/hr	tpy
VOC	0.1	0.1

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-20A, SN-20B, SN-22A, SN-22B, and SN-128
Mill Exhaust

Source Description

Source Number	Description
SN-20 A	Cold Mill Exhaust Stack
SN-20 B	Cold Mill VOC Fugitives
SN-22 A	Finished Foil Mill Exhaust Stack
SN-22 B	Finished Foil Mill VOC Fugitives
SN-128*	Parts Cleaner VOC Fugitives

* SN-128 uses a non-HAP, non-halogenated degreasing solution.

The cold mill (source SN-20A) processes approximately 277,000 tons of cast aluminum coil per year. Emissions are controlled through the use of a mist cyclone.

The finish foil mill (SN-22A) produces approximately 21,300 tons of rolled aluminum sheet per year. Emissions from this source are generated through the cutting of the aluminum sheets, evaporation of the rolling oil on the sheets, and the products of combustion. Emissions at this source are controlled through the use of a mist cyclone and a regenerative catalytic oxidizer (RCO). The RCO utilizes the heating value of the VOCs in the mill exhaust to sustain combustion. The RCO is also supplemented with natural gas to:

1. Preheat the unit after mill shutdowns, and
2. Maintain the destruction temperature in the chamber to account for fluctuations in the outside temperature, variability in the VOC concentration vented to the RCO, and short duration mill operation interruptions such as starting or ending a run.

VOCs from the rolling oil used in the production of aluminum foil are lost to the atmosphere at multiple locations throughout the facility. The rolling mill fugitives and the parts cleaner (SN-128) emissions are grouped together in this permit as it is not practical to try to individually quantify the loss from each area of the mill. In order to quantify the combined fugitive

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

emissions from this source VOC testing was conducted at four different locations at the plant while the equipment was at normal operation. The locations tested were the north roof vent, north wall vent, south roof vent, and south wall vent.

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation #19) effective February 15, 1999 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The following emission rates are based on tests which were conducted while the equipment was operating at capacity.

SN	Pollutant	lb/hr	tpy
20A	PM ₁₀	10.3	45.1
	VOC	4.5	19.7
20B, 22B, & 128	VOC	19.8	86.7
22 A	PM ₁₀	6.2	27.2
	SO ₂	0.1	0.1
	VOC	8.0	35.0
	CO	0.5	2.1
	NO _x	0.8	3.5

- Pursuant to §18.801 of the Arkansas Air Pollution Control Code (Regulation #18) effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The following emission rates are based on tests which were conducted while the equipment was operating at capacity.

SN	Pollutant	lb/hr	tpy
20A	PM	10.3	45.1
22A	PM	6.2	27.2

- Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the rolling oil used at source SN-20A shall have an initial boiling point of at least 350E F while the rolling oil used at source SN-22A shall have an initial boiling point of at least 300E F.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

5. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall obtain a Manufacturer's Certificate of Analysis for each incoming shipment of rolling oil in order to demonstrate compliance with Specific Condition 4 and which may be used by the Department for enforcement purposes. These records shall be kept on site and shall be made available to Department personnel upon request.
6. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, only mill exhaust gas and pipeline quality natural gas shall be combusted in the Regenerative Catalytic Oxidizer (RCO).
7. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the RCO at a minimum of 600E F at all times while the finish mill is operating.
8. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the RCO in order to demonstrate compliance with Specific Condition 7 and which may be used by the Department for enforcement purposes. These records shall be kept on site and made available to Department personnel upon request.
9. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee may manually record the operating temperature of the RCO if the continuous monitoring device is out of service due to maintenance and/or failure. The permittee is required to notify the Department at least fifteen days prior to scheduled maintenance of the continuous monitoring device. In the event of a failure, the permittee is required to notify the Department according to the CEMS conditions.
10. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-20A and SN-22A as measured by EPA Reference Method 9.
11. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-20A and SN-22A shall be conducted by personnel familiar with the sources' emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. (NOTE: This condition does not require the permittee to perform an EPA Method 9 reading.)

- A. The date and time of the observation.
 - B. If visible emissions which appeared to be above the permitted limit were detected.
 - C. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - D. The name of the person conducting the opacity observations.
12. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test sources SN-20A and SN-22A while each source is operating at least at 90% capacity for particulate matter and volatile organic compounds using EPA Reference Methods 5 and 25A, respectively, no later than September 2001. If the facility passes those tests, the tests shall then be repeated once every five years. Failure of any test will require the permittee to repeat the testing every other year.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-30
Dry Trim System Bailer Cyclone

Source Description

This cyclone collects edge and end trim scrap from the separator/slitter lines. Emissions from this cyclone are expected to consist only of particulate matter since the amount of oil on the foil at this point in the overall process is considered to be negligible.

Specific Conditions

13. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the following emission rates at source SN-30. The following emission rates are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM ₁₀	1.0	4.4

14. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-30. The following emission rates are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM	1.0	4.4

15. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity as measured by EPA Reference Method 9 from source SN-30.
16. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-30 shall be conducted by personnel familiar with the source's emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. (NOTE: This condition does not require the permittee to perform an EPA Method 9 reading.)

- A. The date and time of the observation.
- B. If visible emissions which appeared to be above the permitted limit were detected.
- C. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
- D. The name of the person conducting the opacity observations.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-40, SN-41, SN-50, SN-51, & SN-52
Annealing Ovens

Source Descriptions

The sheet annealers (sources SN-40 and SN-41) are used to heat treat or anneal the metal between runs on the cold mill or after a production run is completed on the cold mill. Emissions from these ovens consist of VOCs generated by the residual rolling oil on the metal and the products of combustion of natural gas.

The finish annealers (sources SN-50, SN-51, and SN-52) are used to heat treat or anneal the metal between runs on the finish foil mill or at the end of a production run prior to packaging. Emissions from this process consist of VOCs generated by the residual rolling oil on the metal and the products of combustion of natural gas.

No control equipment is associated with these annealing ovens.

Specific Conditions

17. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the following emission rates at the designated sources. The emission rates, with the exception of VOC, are based on the heat capacity of the equipment. Compliance with those emission rates will be demonstrated by using only natural gas to fire the ovens. Compliance with the VOC emission rates will be demonstrated through the minimum boiling points of the oil used at sources SN-20A for the sheet annealers and SN-22A for the finish annealers.

SN	Pollutant	lb/hr	tpy
40	PM ₁₀	0.2	0.7
	SO ₂	0.1	0.1
	VOC	9.9	36.1
	CO	0.4	1.6
	NO _x	0.6	2.7
41	PM ₁₀	0.2	0.7
	SO ₂	0.1	0.1
	VOC	9.9	36.1
	CO	0.4	1.6
	NO _x	0.6	2.7

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN	Pollutant	lb/hr	tpy
50	PM ₁₀	0.1	0.4
	SO ₂	0.1	0.1
	VOC	1.9	8.3
	CO	0.4	1.6
	NO _x	0.6	2.7
51	PM ₁₀	0.1	0.4
	SO ₂	0.1	0.1
	VOC	1.9	8.3
	CO	0.4	1.6
	NO _x	0.6	2.7
52	PM ₁₀	0.1	0.4
	SO ₂	0.1	0.1
	VOC	1.9	8.3
	CO	0.4	1.6
	NO _x	0.6	2.7

* Additional compliance requirement for SN-40 and SN-41 in Specific Condition

18. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The emission rates are based on the heat capacity of the equipment. Compliance with these emission rates will be demonstrated by using only natural gas to fire the ovens.

SN	Pollutant	lb/hr	tpy
40	PM	0.2	0.7
41	PM	0.2	0.7
50	PM	0.1	0.4
51	PM	0.1	0.4
52	PM	0.1	0.4

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

19. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity as measured by EPA Reference Method 9 at any of the annealing ovens.

20. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-51 and SN-52 shall be conducted by personnel familiar with the source's emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. (NOTE: This condition does not require the permittee to perform an EPA Method 9 reading.)
 - A. The date and time of the observation.
 - B. If visible emissions which appeared to be above the permitted limit were detected.
 - C. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - D. The name of the person conducting the opacity observations.

21. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, pipeline quality natural gas shall be the only fuel used to fire any of the annealing ovens.

22. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 7300 hours of operation while processing aluminum product for each source at SN-40 and SN-41. Sources SN-50, SN-51, and SN-52 are permitted at 8760 hours of operation per year and will require no record keeping, unlike SN-40 and SN-41.

23. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records that demonstrate compliance with Specific Condition 22 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

24. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test one sheet annealer and one finish annealer while each source is processing aluminum at least at 90% equipment capacity for emissions of volatile organic compounds using EPA Reference Method 25A, within ninety (90) days of August 15, 2002. If the facility passes those tests, the tests shall than be repeated once every five years thereafter. Failure of any test will require the permittee to repeat the testing every other year.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

**SN-45 and SN-58
Exothermic Gas Generators**

Source Description

The exothermic gas generators produce the inert nitrogen atmosphere for the annealing ovens. The process uses controlled combustion to eliminate the oxygen in the air and create a nitrogen rich atmosphere.

These generators are fired with natural gas. No control equipment is associated with these sources.

Specific Conditions

25. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emissions are based on the capacity of the equipment. Compliance will be demonstrated by using only natural gas to fire these sources.

SN	Pollutant	lb/hr	tpy
45	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.2	0.7
	NO _x	0.2	0.9
58	PM ₁₀	0.1	0.1
	SO ₂	0.1	0.1
	VOC	0.1	0.1
	CO	0.2	0.7
	NO _x	0.2	0.9

26. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. These emissions are based on the capacity of the equipment. Compliance will be demonstrated by using only natural gas to fire these sources.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN	Pollutant	lb/hr	tpy
45	PM	0.1	0.1
58	PM	0.1	0.1

27. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall use only pipeline quality natural gas to fire the exothermic generators.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-61
Wet Trim System Bailer

Source Description

This operation captures the edge trim from the foil exiting the finish foil mill. Emissions from this process consist of particulate matter and volatile organic compounds. Finish foil mill aluminum scrap will have some amount of lubricating oil on it from the mill. Therefore, VOC emissions result from the evaporation of oil from the metal traveling through the trim system.

A cyclone is associated with this source.

Specific Conditions

28. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the following emission rates at source SN-61. These emissions are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM ₁₀	1.0	4.4
VOC	1.2	5.1

29. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-61. These emissions are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM	1.0	4.4

30. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-61 as measured by EPA Reference Method 9.
31. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-61 shall be conducted by personnel familiar with the source's emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions,

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. (NOTE: This condition does not require the permittee to perform an EPA Method 9 reading.)

- A. The date and time of the observation.
 - B. If visible emissions which appeared to be above the permitted limit were detected.
 - C. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - D. The name of the person conducting the opacity observations.
32. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall test source SN-61 for PM and VOC emissions using EPA Reference Methods 5 and 25A, respectively. These tests shall take place within 90 days of permit issuance and in accordance with the Plantwide Conditions. Test results in excess of the permitted PM emission rate shall also be considered a violation of the permitted PM₁₀ emission rate.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-71 - SN-77 and SN-90 - SN-93
Oil Tank Operations

Source Description

The oil tank operations are used to receive, store, and distill the rolling oil needed for facility operations. No control equipment is associated with any of the equipment comprising the oil tank operations. Oil receipt at this facility are limited to a total of 500,000 gallons per twelve month period.

Specific Conditions

33. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources.

SN	Pollutant	lb/hr	tpy
71	VOC	0.6	0.1
72	VOC	0.6	0.1
73	VOC	0.6	0.1
74	VOC	0.6	0.1
75	VOC	0.6	0.1
76	VOC	0.6	0.1
77	VOC	0.6	0.1
90	VOC	0.6	0.1
91	VOC	0.6	0.1
92	VOC	0.6	0.1
93	VOC	0.6	0.1

34. Pursuant to §19.705 of Regulation 19, 40 CFR §70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the throughputs set forth in the

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

following table at the designated sources in any consecutive twelve month period.

SN	Oil Throughput, gallons*
71	500,000
72	500,000
73	500,000
74	500,000
75	500,000
76	500,000
77	500,000
90	500,000
91	500,000
92	500,000
93	500,000

* There is a plantwide limit of 500,000 gallons of oil to be received at the facility. The limits in table above correspond to reuse of the oil and, therefore, the refilling of the tanks. Each tank has been permitted to turn 25 times in a consecutive twelve (12) month period.

35. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the throughput at each source by retaining bills of lading for incoming and outgoing oil shipments in order to demonstrate compliance with Specific Conditions 31 and 32 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.
36. Pursuant to §19.304 of Regulation 19 and 40 CFR §60.110b, vessels with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from the General Provisions (40 CFR Part

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

60, Subpart A) and from the provisions of this subpart.

37. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain documentation of the tanks' sizes and true vapor pressures in order to demonstrate that the tanks are exempt from 40 CFR Part 60, Subpart Kb. The documentation shall be kept on site and made available to Department personnel upon request.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SN-129
Cooling Tower

Source Description

Particulate matter in the cooling water is emitted as the cooling water evaporates from the heat transfer process.

No control equipment is associated with the cooling tower.

Specific Conditions

38. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-129. These emission rates are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM ₁₀	1.8	7.5

39. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-129. These emission rates are based on the capacity of the equipment.

Pollutant	lb/hr	tpy
PM	1.8	7.5

40. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-129 as measured by EPA Reference Method 9.
41. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-129 shall be conducted by personnel familiar with the source's emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action. The permittee shall maintain records which contain the following items in order to demonstrate compliance

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. (NOTE: This condition does not require the permittee to perform an EPA Method 9 reading.)

- A. The date and time of the observation.
- B. If visible emissions which appeared to be above the permitted limit were detected.
- C. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
- D. The name of the person conducting the opacity observations.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Alumax Foils, Inc. is in compliance with the applicable regulations cited in the permit application. Alumax Foils, Inc. will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.410(B) of Regulation 19, 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
4. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
 - a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
5. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

6. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
7. Pursuant to §18.801 of Regulation 18, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.
8. Pursuant to §18.901 of Regulation 18, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.
9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not receive more than 500,000 gallons of oil in a consecutive twelve (12) month period.
10. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records that demonstrate compliance with Plantwide Condition 9 and which may be used by the Department for enforcement purposes. The permittee shall track throughput by obtaining a Bill of Lading for each shipment of oil. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

Permit Shield

11. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:
 - A. The following have been specifically identified as federally enforceable applicable requirements based upon information submitted by the permittee in an application dated February 10, 1998.

Source No.	Regulation	Description
Facility	19	SIP

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

Source No.	Regulation	Description
Facility	26	Title V

- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated February 10, 1998.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Storage vessels constructed after 5/18/78	40 CFR Part 60, Subpart K	tanks	the tanks are all less than 40,000 gallons
VOL storage vessels constructed after 7/23/84	40 CFR Part 60, Subpart Ka	tanks	the tanks are all less than 40,000 gallons

- C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions

12. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

- requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
13. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
14. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
15. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

16. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated July 26, 2001.

Description	Category
Grinder-Water Evaporator	Regulation 19, Appendix A, Group A, #13
Loading Stations	Regulation 19, Appendix A, Group A, #13
140 Distillation Operation	Regulation 19, Appendix A, Group A, #13
MSO Distillation Operation	Regulation 19, Appendix A, Group A, #13

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000, this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.406 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.701(A)(2) of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.701(C)(2) of Regulation #26, records of monitoring information required by this permit shall include the following:
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

- c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.701(C)(2)(b) of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.701(C)(3)(a) of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.701(C)(3)(b) of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
- a. The facility name and location,
 - b. The process unit or emission source which is deviating from the permit limit,
 - c. The permit limit, including the identification of pollutants, from which deviation occurs,
 - d. The date and time the deviation started,

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

- e. The duration of the deviation,
- f. The average emissions during the deviation,
- g. The probable cause of such deviations,
- h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
- i. The name of the person submitting the report.

A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include, in addition to the information required by initial report, a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

- 9. Pursuant to 40 CFR 70.6(a)(5) and §26.701(E) of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
- 10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.701(F)(1) of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.701(F)(2) of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.701(F)(3) of Regulation #26, 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 does

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

not stay any permit condition.

13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.701(F)(4) of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.701(F)(5) of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.
15. Pursuant to 40 CFR 70.6(a)(7) and §26.701(G) of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.701(H) of Regulation #26, 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 elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.701(I)(1) of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.702(A) and (B) of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

19. Pursuant to 40 CFR 70.6(c)(1) and §26.703(A) of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.703(B) of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.
21. Pursuant to 40 CFR 70.6(c)(5) and §26.703(E)(3) of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.704(C) of Regulation #26, nothing in this permit shall alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including

Alumax Foils, Inc.
Permit #: 1659-AOP-R1
CSN #: 58-0272

- the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

INVOICE REQUEST FORM

PDS- _____

Date September 24, 2002

- | | |
|-------------------------------------|----------------------|
| <input checked="" type="checkbox"/> | Air |
| <input type="checkbox"/> | NPDES |
| <input type="checkbox"/> | Stormwater |
| <input type="checkbox"/> | State Permits Branch |
| <input type="checkbox"/> | Solid Waste |

CSN 58-0272

Facility Name Alumax Foils, Inc.

Invoice Mailing Address 777 Tyler Road

Russellville, Arkansas 72802

- | | |
|--------------------------|--------------|
| <input type="checkbox"/> | Initial |
| <input type="checkbox"/> | Modification |
| <input type="checkbox"/> | Annual |

Permit Number 1659-AOP-R1

Permit Description Title 5

Permit Fee Code A

Amount Due\$ 1000.00

Engineer Charles Hurt

Paid? No Yes Check # _____

Comments: Air Permit Fee Calculation

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Alumax Foils, Inc. owns and operates an aluminum foil rolling mill located at 777 Tyler Road in Russellville, Arkansas 72802. The permit revisions are due to a permit appeal resolution (PAR). The PAR became effective August 15, 2002 and addressed the revision of testing time requirements for Specific Conditions #12 and Specific Condition #24. Also "Safety-Kleen" has been removed from the process description for SN-128. No changes in emissions or method of operation have occurred in this permitting action.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact , Charles Hurt, E. I. Both Doug Szenher and Charles Hurt can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Pope County Library, 116 East Third St., Russellville, Arkansas 72801. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Marcus C. Devine
Director