

ADEQ OPERATING AIR PERMIT

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

Permit No. : 1016-AOP-R3

Renewal #1

IS ISSUED TO:

Reynolds Metals Company

500 East Reynolds Road

Arkadelphia, AR 71923

Clark County

AFIN: 10-00004

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:

AND

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

Date

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List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

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SECTION I: FACILITY INFORMATION

PERMITTEE: Reynolds Metals Company

AFIN: 10-00004

PERMIT NUMBER: 1016-AOP-R3

FACILITY ADDRESS: 500 East Reynolds Road
Arkadelphia, AR 71923

MAILING ADDRESS: 500 East Reynolds Road
Arkadelphia, AR 71923

COUNTY: Clark

CONTACT POSITION: Lyn Shepherd

TELEPHONE NUMBER: (870) 245-2720

REVIEWING ENGINEER: Michael H. Watt

UTM North South (Y): Zone 15: 3769.5 km

UTM East West (X): Zone 15: 492.8 km

SECTION II: INTRODUCTION

Summary of Permit Activity

Reynolds Metals Company (Reynolds) operates a spent potliner thermal treatment process at its facility located in Gum Springs, Arkansas. The facility consists of a potliner pretreatment system and a thermal treatment system. The latter (two waste kilns) operates under interim status as hazardous waste incinerators (40 C.F.R. § 265). A Part B permit application was submitted in August 1993 and updated in December 1997. This is also the first Title V Renewal for this facility.

The first minor modification is to allow the permittee to install a new loadout system which consists of a new belt conveyor, screw conveyor, bucket elevator, and truck loadout for the Potliner Building. The emissions from the new system will be collected with several new emissions pick-up points, which will exhaust through the existing baghouse system (SN-06). Since the SN-06 dust collector has already been permitted for equipment expansion and continuous operation, emission limits will not be affected and no change in conditions is requested. (Note: Although permitted, this loadout system was not constructed. Reynolds later developed an alternate design for a loadout system, the third minor modification listed below.)

The second minor modification involves changing the Area 20 dust collectors (SN-01, SN-02, SN-05, SN-26, and SN-27). The changes are the result of system repairs and optimizations as recommended in an engineering study. Through elimination of unnecessary air bleed-ins, and by applying collection air to the proper places, the study recommends elimination of SN-02 and an air volume reduction in dust collector SN-26 from 30,000 cfm to 28,000 cfm. The total Area 20 dust collection exhaust volume will be reduced from a total of 71,700 cfm to 64,000 cfm.

The third minor modification involves installation of a new truck loadout system for prepared potliner feed. The system will be an extension of the feed delivery system to the Kiln (SN-09). A diverter valve will allow the operator to send feed to either the Kiln or to the new loadout, which consists of conveyors, a tote delivery system, vibrators, an articulating arm, and an inline dust collector (SN-31 which is an Insignificant Activity). Material sent to the new loadout system will then be shipped via truck for further treatment at an off-site facility. Permitted particulate emissions from SN-09 will not be changed and the permitted increases from the new SN-31 will be 0.2 tons per year of particulate, 1.23 tons per year of ammonia, and trace amounts of heavy metals included in the total particulate.

Finally, a full modification has been submitted to update stack testing requirements to the 40 CFR 63, Subpart EEE, National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, standards. This permit modification will also include all requirements associated with 40 CFR 63, Subpart EEE.

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This is also the Title V Renewal Application for this facility. In the renewal, chlorine has been added to the Off-Gas Stack (SN-19). This is based on stack testing results and was not included in previous permits. There is no physical change associated with this permitted increase in emissions. In addition, Polycyclic Aromatic Hydrocarbons have been determined not to be VOCs.

Process Description

Potliner is a carbon and refractory material used to line the inner surface of large production vessels (i.e., "pots") used in the electrolytic reduction of alumina to aluminum. When worn out or "spent," the potliner is removed and replaced. Due to the presence of cyanide compounds, spent potliner (SPL) is a listed hazardous waste (EPA waste code K088) subject to regulation under the Resource Conservation and Recovery Act (RCRA). SPL also contains fluorides and other contaminants which are regulated by state and federal air pollution control regulations.

The spent potliner treated at the Gum Springs plant is a dry material with aggregate sizes ranging from fine to greater than one foot in diameter. Spent potliner is transported to the treatment facility in 20-cubic yard capacity, water tight containers via rail cars or trucks. Forklifts are used to off-load the closed containers at an outdoor unloading area. The containers are then transferred to a storage area where they remain closed during storage until the potliner can be removed and prepared for treatment.

The spent potliner pretreatment area is located entirely within an enclosed building at the facility. The pretreatment process begins when the containers are unloaded using a tilting platform onto a conveyor belt system. The unloading station is used to distribute the potliner material uniformly onto the conveyor belt that runs through the picking/sorting area where very large pieces of material and non-potliner are removed manually and magnetically.

Oversize SPL material reject/removed from the SPL crushing system is either placed in a container or placed on a steel pan located on the floor located at the southwest end of the crushing area (Area 20). The material on the steel pan is reduced in size using a multiprocessor (similar to a Caterpillar MP20 Multiprocessor) fitted with jaws (similar to concrete cutter jaws) mated to an excavator (similar to a Caterpillar Model 325-series Hydraulic Excavator). The material reduced in size is introduced back into the crushing system.

The spent potliner is first delivered to a screen (SN-02) located prior to the jaw crusher. The larger material coming off this screen passes through the jaw crusher. The smaller material passing through this screen is conveyed to the crushed potliner storage building. In summary, the spent potliner meeting the sizing requirements for thermal treatment is removed from the crushing circuit prior to crushing.

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After the jaw crusher, the ferrous and non-ferrous tramp metals are removed via cross-belt magnets, magnetic head pulley conveyor, eddy-current aluminum separator, and screens. The spent potliner is then conveyed to a screen (SN-03) just ahead of the impact mill. Material passing through this screen is conveyed to the crushed potliner storage building for storage prior to thermal treatment. The material not passing screen SN-03 passes through the impact mill for size reduction. After the impact mill, the material is conveyed to a screen (SN-05) to remove particles sized for thermal treatment. Any material needing further size reduction is recycled back through the tramp metals removing equipment, screen SN-03 impact mill, and SN-05.

The plant has the capability to remove the recycle material from the system. Properly sized solids are sent to the crushed potliner storage building. All conveyor systems throughout the pretreatment process are covered and dust collectors are located at all material transfer points.

Once properly sized, the crushed material is transferred to the crushed potliner storage building via a bucket elevator and a tripper conveyor. The storage building is fully enclosed to control fugitive emissions. Air from the building is pulled through dust collectors and emitted to the atmosphere through a 55-foot stack. Front-end loaders are used to reclaim the material from the piles and load it into a reclaim hopper. Sand and limestone are each transported to the facility via truck or rail and stored in separate piles. These materials are also reclaimed using front-end loaders and distributed into two separate reclaim hoppers. Each material travels by weighing conveyors to the kiln feed bin. The conveyors are controlled by a Programmable Logic Controller (PLC) system, ensuring that each material is fed in the proper proportion according to a preset recipe. The three materials are continuously weighed and fed to the 400-ton capacity kiln feed bin as required. Since this bin holds several hours of feed to the kilns, it is fed intermittently. Alternately, unblended crushed SPL material may be conveyed to the SPL Truck Loadout system for shipment off-site.

The kiln feed mixture is fed via weighing conveyors, belt conveyors, and screw conveyors to one of two 250-foot long countercurrent, rotary kilns operating either simultaneously or individually. For treatment and dust control, contact water, landfill leachate and/or landfill storm water runoff is injected via nozzle into the feed end of the kiln. Contact water contains spent potliner and is generated at the plant by cleanup and/or decontamination activities. Landfill runoff is storm water that runs off from the on-site waste landfill. Landfill leachate is collected from the on-site waste landfill leachate collection system. The landfill is only used for kiln residues, so landfill runoff is similar in characteristics to contact water and landfill leachate.

Combustion air is fed to the kilns after being preheated from the exiting product cooler. The kilns are equipped with seals to prevent fugitive emissions and allow for efficient operation at an internal pressure below atmospheric. The potliner is subjected to a temperature of approximately 1250 °F with a material residence time in the kiln of approximately 90 minutes. The combustion gas streams from the kilns are sent through cyclones and multiclones and then combined prior to being sent to the quench tower and fabric filter baghouse for further particulate removal. The quench tower may or may not need to be used to cool kiln gases prior to entering the baghouse.

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If operated, the quench tower is operated in such a way that there is no liquid recirculation or blowdown. Solids from the cyclones and final baghouse are recycled to the kiln. The gas stream is then reheated in an afterburner/heat exchanger system for further destruction of air pollutants and emitted to the atmosphere through a 100 foot stack.

The treated product is discharged from the kiln, cooled in a rotary cooler, and sent through a series of conveyors to one of three residue storage silos. Samples from each day's generation are tested at the on-site laboratory and/or an off-site contracted laboratory. Residues meeting the land disposal requirements will be transported via truck to the on-site waste landfill for disposal. Residues not meeting the land disposal requirements will be sent via recycle conveyors to the crushed potliner storage building and ultimately back to the kiln for re-treatment.

To minimize dust emissions, spent potliner and treated residue conveyors are covered throughout the potliner preparation, storage, and treatment process, both prior to and following thermal treatment in the kilns. Fabric filter dust collectors are located at all material transfer points from pretreatment through loadout of residue to the landfill.

Waste Feed Operations

The waste feed material is made up of crushed potliner, limestone, and sand. The maximum feed to the kilns in the current permit is 30 tons/hour/kiln. The volumetric gas flow rate through the kilns is 208,579 acfm (53,147 dscfm), which represents the maximum flow rate. This was done to present a worst case scenario for estimating emissions associated with these two sources.

Contact water, landfill leachate, and/or landfill runoff is also fed to the kiln at a maximum rate of 5 gpm/kiln. As this water contains less than 10 percent solids, it adds less than 0.05 percent to the total feed to the kiln. Spent potliner is delivered to the site from both Reynolds and non-Reynolds sources throughout North America.

Kiln Operations

The kilns at the Gum Springs plant were commissioned and started in April 1994 for Kiln Number 1 and August 1993 for Kiln Number 2. Following a shakedown period, each kiln and afterburner reached full operating capacity within 4 to 6 weeks after startup. The kilns are fired by natural gas burners and are heated upon start-up until both kiln system and afterburner are above permitted temperatures, and within other permitted operating conditions, prior to potliner feed being conveyed into the kiln. If at any time permit conditions are not maintained throughout the system, waste feed to the kiln is automatically shut off. Permitted operating conditions within the thermal treatment system are monitored by a series of weight belts, flow meters, thermocouples, pressure transmitter, and redundant stack gas monitoring instruments.

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Potliner Storage Operations

A containment building stores prepared spent potliner prior to thermal treatment. After crushing and sizing operation, the potliner is conveyed by bucket elevator to a tripper conveyor which builds approximately 14-foot high piles of crushed potliner within the central working area of the containment building. Fugitive dust emission control is provided by use of I.D. fans pulling 33,000 acfm through the building which exhausts through the potliner storage building dust collectors. No visible emissions are exhibited during routine operating and maintenance conditions or when vehicles and personnel are entering/exiting the building.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective May 28, 2006
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 63, Subpart EEE, National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
40 CFR 64, Compliance Assurance Monitoring

The facility is not subject to 40 CFR 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants because the spent potliner is not a nonmetallic mineral since the majority of the SPL is carbon material.

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	11.70	47.00
		PM ₁₀	11.7	47.0
		SO ₂	0.6	2.0
		VOC	7.3	32.0
		CO	22.9	100.0
		NO _x	52.0	205.0
		Lead	5.03E-02	2.12E-02
HAPs Note: Polycyclic Aromatic Hydrocarbons are not VOCs.		Antimony Compounds	1.41E-04	6.30E-04
		Arsenic Compounds	2.03E-02	9.11E-02
		Beryllium Compounds	2.04E-02	9.15E-02
		Cadmium Compounds	5.02E-02	2.11E-01
		Chlorine	22.87	100.18
		Chromium Compounds	2.20E-02	9.52E-02
		Dioxin and Furans*	8.00E-08	3.48E-07
		Fluorides	1.48	6.48
		Hydrogen Chloride	22.87	100.18
		Mercury	0.03	0.11
		Polycyclic Aromatic Hydrocarbons	0.69	2.99
Air Contaminants **		Ammonia**	15.92	69.94
SN	Description	Pollutant	lb/hr	tpy
01	Receiving Area Dust Collector	PM ₁₀	0.3	1.0
		PM	0.30	1.00
		Lead	2.00E-05	8.60E-05
		Ammonia**	0.16	0.68
		Antimony Compounds	1.00E-05	4.40E-05
		Arsenic Compounds	1.50E-05	6.60E-05
		Beryllium Compounds	2.40E-05	1.10E-04
		Cadmium Compounds	5.80E-06	2.50E-05
		Chromium Compounds	8.30E-05	3.60E-04
		Polycyclic Aromatic Hydrocarbons*	5.60E-05	2.50E-04

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
02	Jaw Crusher Area Dust Collector	Source Removed From Service.		
05	Mill Area Dust Collector	PM ₁₀	0.3	1.0
		PM	0.30	1.00
		Lead	1.90E-05	8.20E-05
		Ammonia**	2.94	12.87
		Antimony Compounds	1.00E-05	4.40E-05
		Arsenic Compounds	1.50E-05	6.60E-05
		Beryllium Compounds	2.40E-05	1.10E-04
		Cadmium Compounds	5.80E-05	2.50E-05
		Chromium Compounds	8.30E-04	3.60E-04
		Polycyclic Aromatic Hydrocarbons	5.60E-04	2.50E-04
06	Potliner Building Dust Collector	PM ₁₀	0.6	2.5
		PM	0.60	2.50
		Lead	5.30E-05	2.30E-04
		Ammonia**	2.41	10.56
		Antimony Compounds	2.70E-05	1.20E-04
		Arsenic Compounds	4.00E-05	1.80E-04
		Beryllium Compounds	6.40E-05	2.80E-04
		Cadmium Compounds	1.60E-05	6.90E-05
		Chromium Compounds	2.30E-04	9.90E-04
		Polycyclic Aromatic Hydrocarbons	1.50E-04	6.60E-04
07	Limestone Reclaim Dust Collector	PM ₁₀	0.3	1.2
		PM	0.30	1.20
		Ammonia**	0.08	0.34
08	Brown Sand Reclaim Dust Collector	PM ₁₀	0.3	1.2
		PM	0.30	1.20
		Lead	2.40E-05	1.10E-04
		Ammonia**	0.12	0.51
		Antimony Compounds	1.20E-05	5.40E-05
		Arsenic Compounds	1.80E-05	8.00E-05
		Beryllium Compounds	2.90E-05	1.30E-04
		Cadmium Compounds	7.20E-06	3.10E-05
		Chromium Compounds	1.00E-04	4.50E-04

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
09	Kiln Feed Bin Dust Collector	PM ₁₀	0.4	1.8
		PM	0.40	1.80
		Lead	3.60E-05	1.60E-04
		Ammonia**	2.52	11.04
		Antimony Compounds	1.90E-05	8.20E-05
		Arsenic Compounds	2.70E-05	1.20E-04
		Beryllium Compounds	4.40E-05	1.90E-04
		Cadmium Compounds	1.10E-05	4.70E-05
		Chromium Compounds	1.50E-04	6.70E-04
		Polycyclic Aromatic Hydrocarbons	1.00E-04	4.50E-04
10	Kiln #1 Feed Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.68	2.98
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
11	Kiln #2 Feed Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.68	2.98
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
12	Kiln #1 Discharge Dust Collector	PM ₁₀	0.1	0.3
		PM	0.10	0.30
		Lead	1.10E-09	4.90E-09
		Ammonia**	0.16	0.68
		Antimony Compounds	3.40E-09	1.50E-08
		Arsenic Compounds	4.00E-06	1.80E-05
		Beryllium Compounds	1.40E-09	6.10E-09
		Cadmium Compounds	3.10E-09	1.30E-08
		Chromium Compounds	4.10E-08	1.80E-07
13	Kiln #2 Discharge Dust Collector	PM ₁₀	0.1	0.3
		PM	0.10	0.30
		Lead	1.10E-09	4.90E-09
		Ammonia**	0.16	0.68
		Antimony Compounds	3.40E-09	1.50E-08
		Arsenic Compounds	4.00E-06	1.80E-05
		Beryllium Compounds	1.40E-09	6.10E-09
		Cadmium Compounds	3.10E-09	1.30E-08
		Chromium Compounds	4.10E-08	1.80E-07
14	Product Silo Dust Collector	PM ₁₀	0.2	0.9
		PM	0.20	0.90
		Lead	3.90E-09	1.70E-08
		Ammonia**	0.06	0.26
		Antimony Compounds	1.20E-08	5.10E-08
		Arsenic Compounds	1.40E-05	6.00E-05
		Beryllium Compounds	4.80E-09	2.10E-08
		Cadmium Compounds	1.10E-08	4.60E-08
		Chromium Compounds	1.40E-07	6.20E-07
15	Product Silo #7 Dust Collector	PM ₁₀	0.1	0.3
		PM	0.10	0.30
		Lead	1.30E-09	5.60E-09
		Ammonia**	0.02	0.09
		Antimony Compounds	3.80E-09	1.70E-08
		Arsenic Compounds	4.60E-06	2.00E-05
		Beryllium Compounds	1.60E-09	7.00E-09
		Cadmium Compounds	3.50E-09	1.50E-08
		Chromium Compounds	4.70E-08	2.10E-07

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
16	Product Loadout Bin Dust Collector	PM ₁₀	0.2	0.5
		PM	0.20	0.50
		Lead	2.10E-09	9.40E-09
		Ammonia**	0.03	0.14
		Antimony Compounds	6.40E-09	2.80E-08
		Arsenic Compounds	7.70E-06	3.40E-05
		Beryllium Compounds	2.70E-09	1.20E-08
		Cadmium Compounds	5.90E-09	2.60E-08
		Chromium Compounds	7.90E-08	3.40E-07
18	Kiln Waste Dust Collector	PM ₁₀	0.1	0.3
		PM	0.10	0.30
		Lead	6.00E-06	2.60E-05
		Ammonia**	0.02	0.09
		Antimony Compounds	3.10E-06	1.30E-05
		Arsenic Compounds	4.50E-06	2.00E-05
		Beryllium Compounds	7.20E-06	3.20E-05
		Cadmium Compounds	1.80E-06	7.70E-06
		Chromium Compounds	2.50E-05	1.10E-04
Polycyclic Aromatic Hydrocarbons	1.70E-05	7.40E-05		
19	Off-Gas Stack	PM ₁₀	6.8	29.7
		PM	6.80	29.70
		SO ₂	0.6	2.0
		VOC	7.3	32.0
		CO	22.9	100.0
		NO _x	52.0	205.0
		Lead	0.05	0.21
		Arsenic Compounds	0.02	0.09
		Beryllium Compounds	0.02	0.09
		Cadmium Compounds	0.05	0.21
		Chromium Compounds	0.02	0.09
		Chlorine	22.87	100.18
		Dioxins and Furans*	8.00E-08	3.48E-07
		Fluorides	1.48	6.48
		Hydrochloric Acid	22.87	100.18
Mercury	0.03	0.11		
Polycyclic Aromatic Hydrocarbons	0.68	2.98		

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
20	Off-Spec Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
21	Off-Spec Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
22	Off-Spec Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
23	Product Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
24	Product Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
25	Product Transfer Dust Collector	PM ₁₀	0.1	0.2
		PM	0.10	0.20
		Lead	3.20E-06	1.40E-05
		Ammonia**	0.01	0.05
		Antimony Compounds	1.60E-06	7.10E-06
		Arsenic Compounds	2.40E-06	1.00E-05
		Beryllium Compounds	3.80E-06	1.70E-05
		Cadmium Compounds	9.40E-07	4.10E-06
		Chromium Compounds	1.30E-05	5.90E-05
		Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
26	Secondary Screen Area Dust Collector	PM ₁₀	0.5	2.1
		PM	0.50	2.10
		Lead	4.80E-05	2.10E-04
		Ammonia**	2.94	12.87
		Antimony Compounds	2.30E-05	1.00E-04
		Arsenic Compounds	3.40E-05	1.50E-04
		Beryllium Compounds	5.40E-05	2.40E-04
		Cadmium Compounds	1.30E-05	5.70E-05
		Chromium Compounds	1.90E-04	8.30E-04
		Polycyclic Aromatic Hydrocarbons	1.30E-04	5.70E-04
27	Conveyor CV-59	PM ₁₀	0.3	1.0
		PM	0.30	1.00
		Lead	2.00E-05	8.60E-05
		Ammonia**	2.94	12.87
		Antimony Compounds	1.00E-05	4.40E-05
		Arsenic Compounds	1.50E-05	6.60E-05
		Beryllium Compounds	2.40E-05	1.10E-04
		Cadmium Compounds	5.80E-06	2.50E-05
		Chromium Compounds	8.30E-05	3.60E-04
		Polycyclic Aromatic Hydrocarbons	5.60E-05	2.50E-04
30	Incinerator Residue Management	PM ₁₀	0.3	1.3
		PM	0.30	1.30
		Lead	2.80E-05	1.20E-04
		Antimony Compounds	1.40E-05	6.30E-05
		Arsenic Compounds	2.10E-05	9.30E-05
		Beryllium Compounds	3.40E-05	1.50E-04
		Cadmium Compounds	8.30E-06	3.60E-05
		Chromium Compounds	1.20E-04	5.20E-04
		Polycyclic Aromatic Hydrocarbons	7.90E-05	3.50E-04
31	Loadout Inline Dust Collector	Moved to Insignificant Activities.		

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

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SECTION III: PERMIT HISTORY

The SPL process was originally permitted in permit 27-AR-4 issued January 25, 1988 for the Reynolds Hurricane Creek facility. The process used existing equipment from another process at the facility.

Air Permit 1016-A was issued on June 21, 1990. This permit was to allow the process to be moved from the Reynolds Hurricane Creek facility to the current location. Total permitted emissions were 7 lbs/hr particulate, 0.2 lbs/hr SO₂, 4.0 lbs/hr NO_x, 28 lbs/hr CO, 4.0 lbs/hr VOC as well as rates for Pb, Be, F, CN and HCl.

Air Permit 1016-AR-1 was issued on November 29, 1994. In this permit, the emission limit for PAHs was revised to reflect actual emissions test data. The increase was from 0.004 to 0.68 pounds per hour.

Air Permit 1016-AR-2 was issued on November 29, 1994. In this permit, RMC requested that ADEQ permit contact water and landfill runoff as allowable feeds to the SPL treatment process. In addition, the emission limit for PAHs was revised to reflect actual emissions test data. The 0.004 pound per hour limit originally proposed by RMC and incorporated in the previous permit was an estimate that did not adequately account for all PAH formation and destruction mechanisms. In the application for this modification, RMC submitted an analysis indicating that the increase from 0.004 to 0.68 pounds per hour is acceptable and within limits considered to be protective of human health and the environment.

Air Permit 1016-AOP-R0 was issued on May 11, 2000. This permit was the initial Title V permit for the facility. In this permit, the allowable potliner blend ratio was increased from 35 to 40%, the allowable kiln feed rate was increased from 24 to 30 tons per hour, and landfill leachate was included as an acceptable waste feed by direct injection. Ammonia emissions were quantified for the first time in this permit. Allowable emissions of NO_x increased due to most recent testing information and the increase in throughput requested; some other pollutant emission rates changed by small amounts. In addition, the allowable cyanide and fluorides in the feed increased based on testing that demonstrated these increases would not increase emissions of these pollutants. At the issuance date of this permit, the facility was operating under a RCRA permit which does not authorize the increased kiln feed rate. The facility was limited to the lower feed rates until such time as the RCRA permit was revised or superseded by a MACT permit for the combustion units.

Air Permit 1016-AOP-R1 was issued on March 29, 2001. This permit was the first modification to the Title V permit for this facility. This permit changed the source descriptions for SN-27 and SN-29, due to some minor changes to the facility design. There was no change in emissions due to this modification.

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Air Permit 1016-AOP-R2 was issued on July 29, 2004. This was the second modification to the Title V permit for the facility. In this permit, there were no changes in emissions. The permit changes were:

1. Lowering the minimum temperature for the afterburner exit gas from 1800°F to 1750°F,
2. Specifying an hourly rolling average as the averaging time for the aqueous feed rate, the pressure drop across the off-gas dust collector, the afterburner exit gas temperature, the THC concentration in the process off-gas stack, and the off-gas dust collector inlet temperature, and
3. Correcting the numbering of the specific conditions.

Air Permit 1016-AOP-R2 was administratively amended on July 29, 2004. This amendment added the Pelletizing Operation to the Insignificant Activities list.

SECTION IV: SPECIFIC CONDITIONS

**SN-01
 Receiving Area Dust Collector**

Source Description

The Receiving Area Dust Collector (SN-01) controls emissions from the lift and tilt platform, belt feeders, screens and conveyors. Source SN-01 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19, effective May 28, 2006 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.0
Lead	2.00E-05	8.60E-05

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.00
Ammonia	0.16	0.68
Antimony Compounds	1.00E-05	4.40E-05
Arsenic Compounds	1.50E-05	6.60E-05
Beryllium Compounds	2.40E-05	1.10E-04
Cadmium Compounds	5.80E-06	2.50E-05
Chromium Compounds	8.30E-05	3.60E-04
Polycyclic Aromatic Hydrocarbons	5.60E-05	2.50E-04

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3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-01	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

4. The permittee shall conduct weekly observations of the opacity from source SN-01 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-05
 Mill Area Dust Collector**

Source Description

The Mill Area Dust Collector (SN-05) controls emissions from the mill sizing screen, impact mill, impact discharge conveyor and prepared potliner conveyor. Source SN-05 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

5. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.0
Lead	1.90E-05	8.20E-05

6. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.00
Ammonia	2.94	12.87
Antimony Compounds	1.00E-05	4.40E-05
Arsenic Compounds	1.50E-05	6.60E-05
Beryllium Compounds	2.40E-05	1.10E-04
Cadmium Compounds	5.80E-05	2.50E-05
Chromium Compounds	8.30E-04	3.60E-04
Polycyclic Aromatic Hydrocarbons	5.60E-04	2.50E-04

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7. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-05	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

8. The permittee shall conduct weekly observations of the opacity from source SN-05 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-06
 Potliner Building Dust Collector**

Source Description

The Potliner Building Dust Collector (SN-06) controls emissions from the two (2) ceiling vents, SPL reclaim feed hopper and two (2) SPL reclaim feeders. Source SN-06 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

9. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.6	2.5
Lead	5.30E-05	2.30E-04

10. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.60	2.50
Ammonia	2.41	10.56
Antimony Compounds	2.70E-05	1.20E-04
Arsenic Compounds	4.00E-05	1.80E-04
Beryllium Compounds	6.40E-05	2.80E-04
Cadmium Compounds	1.60E-05	6.90E-05
Chromium Compounds	2.30E-04	9.90E-04
Polycyclic Aromatic Hydrocarbons	1.50E-04	6.60E-04

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11. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-06	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

12. The permittee shall conduct weekly observations of the opacity from source SN-06 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-07
 Limestone Reclaim Dust Collector**

Source Description

The Limestone Reclaim Dust Collector (SN-07) controls emissions from the limestone reclaim hopper and limestone reclaim feeder. Source SN-07 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.2

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.20
Ammonia	0.08	0.34

15. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-07	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

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16. The permittee shall conduct weekly observations of the opacity from source SN-07 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-08
Brown Sand Reclaim Dust Collector

Source Description

The Sand Reclaim Dust Collector (SN-08) controls emissions from the sand reclaim hopper and sand reclaim feeder. Source SN-08 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

17. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.2
Lead	2.40E-05	1.10E-04

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.20
Ammonia	0.12	0.51
Antimony Compounds	1.20E-05	5.40E-05
Arsenic Compounds	1.80E-05	8.00E-05
Beryllium Compounds	2.90E-05	1.30E-04
Cadmium Compounds	7.20E-06	3.10E-05
Chromium Compounds	1.00E-04	4.50E-04

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19. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-08	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

20. The permittee shall conduct weekly observations of the opacity from source SN-08 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-09
Kiln Feed Bin Dust Collector

Source Description

The Kiln Feed Bin Dust Collector (SN-09) controls emissions from kiln #1 feed conveyor, kiln #2 feed conveyor, kiln feed bin, two kiln feed bucket elevators, two kiln feed collector conveyors, kiln #1 feeder, and kiln #2 feeder. Source SN-09 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

21. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.4	1.8
Lead	3.60E-05	1.60E-04

22. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.40	1.80
Ammonia	2.52	11.04
Antimony Compounds	1.90E-05	8.20E-05
Arsenic Compounds	2.70E-05	1.20E-04
Beryllium Compounds	4.40E-05	1.90E-04
Cadmium Compounds	1.10E-05	4.70E-05
Chromium Compounds	1.50E-04	6.70E-04
Polycyclic Aromatic Hydrocarbons	1.00E-04	4.50E-04

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23. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-09	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

24. The permittee shall conduct weekly observations of the opacity from source SN-09 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-10
Kiln #1 Feed Dust Collector

Source Description

The Kiln #1 Feed Dust Collector (SN-10) controls emissions from kiln #1 screw conveyor and kiln #1 feed conveyor. Source SN-10 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

25. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.2
Lead	3.20E-06	1.40E-05

26. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.20
Ammonia	0.68	2.98
Antimony Compounds	1.60E-06	7.10E-06
Arsenic Compounds	2.40E-06	1.00E-05
Beryllium Compounds	3.80E-06	1.70E-05
Cadmium Compounds	9.40E-07	4.10E-06
Chromium Compounds	1.30E-05	5.90E-05
Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

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27. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-10	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

28. The permittee shall conduct weekly observations of the opacity from source SN-10 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-11
Kiln #2 Feed Dust Collector

Source Description

The Kiln #2 Feed Dust Collector (SN-11) controls emissions from kiln #2 screw conveyor and kiln #2 feed conveyor. Source SN-11 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

29. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.2
Lead	3.20E-06	1.40E-05

30. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.20
Ammonia	0.68	2.98
Antimony Compounds	1.60E-06	7.10E-06
Arsenic Compounds	2.40E-06	1.00E-05
Beryllium Compounds	3.80E-06	1.70E-05
Cadmium Compounds	9.40E-07	4.10E-06
Chromium Compounds	1.30E-05	5.90E-05
Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

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31. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-11	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

32. The permittee shall conduct weekly observations of the opacity from source SN-11 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-12
Kiln #1 Discharge Dust Collector

Source Description

The Kiln #1 Discharge Dust Collector (SN-12) controls emissions from the kiln #1 collection conveyor and kiln #1 cooler screw conveyor. Source SN-12 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

33. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.3
Lead	1.10E-09	4.90E-09

34. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.30
Ammonia	0.16	0.68
Antimony Compounds	3.40E-09	1.50E-08
Arsenic Compounds	4.00E-06	1.80E-05
Beryllium Compounds	1.40E-09	6.10E-09
Cadmium Compounds	3.10E-09	1.30E-08
Chromium Compounds	4.10E-08	1.80E-07

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35. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-12	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

36. The permittee shall conduct weekly observations of the opacity from source SN-12 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-13
Kiln #2 Discharge Dust Collector

Source Description

The Kiln #2 Discharge Dust Collector (SN-13) controls emissions from the kiln #2 collection conveyor and kiln #2 cooler screw conveyor. Source SN-13 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

37. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.3
Lead	1.10E-09	4.90E-09

38. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.30
Ammonia	0.16	0.68
Antimony Compounds	3.40E-09	1.50E-08
Arsenic Compounds	4.00E-06	1.80E-05
Beryllium Compounds	1.40E-09	6.10E-09
Cadmium Compounds	3.10E-09	1.30E-08
Chromium Compounds	4.10E-08	1.80E-07

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39. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-13	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

40. The permittee shall conduct weekly observations of the opacity from source SN-13 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-14
 Product Silo Dust Collector**

Source Description

The Silo Distribution Dust Collector (SN-14) controls emissions from the product storage bucket elevator, silo #6, silo #6 feed conveyor, silo #7 feed conveyor, silo #8, and silo #8 feed conveyor. Source SN-14 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

41. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.9
Lead	3.90E-09	1.70E-08

42. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.20	0.90
Ammonia	0.06	0.26
Antimony Compounds	1.20E-08	5.10E-08
Arsenic Compounds	1.40E-05	6.00E-05
Beryllium Compounds	4.80E-09	2.10E-08
Cadmium Compounds	1.10E-08	4.60E-08
Chromium Compounds	1.40E-07	6.20E-07

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43. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-14	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

44. The permittee shall conduct weekly observations of the opacity from source SN-14 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-15
 Product Silo #7 Dust Collector**

Source Description

The Product Silo #7 Dust Collector (SN-15) controls emissions from silo #7. Source SN-15 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

45. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.3
Lead	1.30E-09	5.60E-09

46. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.30
Ammonia	0.02	0.09
Antimony Compounds	3.80E-09	1.70E-08
Arsenic Compounds	4.60E-06	2.00E-05
Beryllium Compounds	1.60E-09	7.00E-09
Cadmium Compounds	3.50E-09	1.50E-08
Chromium Compounds	4.70E-08	2.10E-07

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47. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-15	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

48. The permittee shall conduct weekly observations of the opacity from source SN-15 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-16
Product Loadout Bin Dust Collector

Source Description

The Product Loadout Dust Collector (SN-16) controls emissions from two truck loadout bucket elevators and product loadout bins 9 and 10. Source SN-16 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

49. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.2	0.5
Lead	2.10E-09	9.40E-09

50. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.20	0.50
Ammonia	0.03	0.14
Antimony Compounds	6.40E-09	2.80E-08
Arsenic Compounds	7.70E-06	3.40E-05
Beryllium Compounds	2.70E-09	1.20E-08
Cadmium Compounds	5.90E-09	2.60E-08
Chromium Compounds	7.90E-08	3.40E-07

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51. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-16	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

52. The permittee shall conduct weekly observations of the opacity from source SN-16 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-18
 Kiln Waste Dust Collector**

Source Description

The Kiln Waste Dust Collector (SN-18) controls emissions from the dust disengaging vessel and dust loadout feed spout. Source SN-18 is subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

53. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.1	0.3
Lead	6.00E-06	2.60E-05

54. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.10	0.30
Ammonia	0.02	0.09
Antimony Compounds	3.10E-06	1.30E-05
Arsenic Compounds	4.50E-06	2.00E-05
Beryllium Compounds	7.20E-06	3.20E-05
Cadmium Compounds	1.80E-06	7.70E-06
Chromium Compounds	2.50E-05	1.10E-04
Polycyclic Aromatic Hydrocarbons	1.70E-05	7.40E-05

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55. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-18	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

56. The permittee shall conduct weekly observations of the opacity from source SN-18 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-19
Off-Gas Stack**

Source Description

The Off-Gas Stack (SN-19) is the final emission point for the thermal treatment of the SPL. The combustion gas streams from the kilns are sent through cyclones and multiclones and then combined prior to being sent to the quench tower and fabric filter baghouse for further particulate removal. The quench tower may or may not need to be used to cool kiln gases prior to entering the bag house. The gas stream is then reheated in an afterburner/heat exchanger system for further destruction of air pollutants and emitted to the atmosphere through a 100 foot stack.

This source is subject to CAM. However, it is also subject to 40 CFR 63, Subpart EEE, National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. This rule was finalized after November 15, 1990. Therefore, the Off-Gas Stack is exempt from the requirements of CAM.

Specific Conditions

57. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #61 through #78 and Plantwide Conditions #8 through #96. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	6.8	29.7
SO ₂	0.6	2.0
VOC	7.3	32.0
CO	22.9	100.0
NO _x	52.0	205.0
Lead	0.05	0.21

58. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions #61 through #78 and Plantwide Conditions #8 through #96. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	6.80	29.70
Arsenic Compounds	0.02	0.09
Beryllium Compounds	0.02	0.09
Cadmium Compounds	0.05	0.21
Chromium Compounds	0.02	0.09
Chlorine	22.87	100.18
Dioxins and Furans	8.00E-08	3.48E-07
Fluorides	1.48	6.48
Hydrochloric Acid	22.87	100.18
Mercury	0.03	0.11
Polycyclic Aromatic Hydrocarbons	0.68	2.98

59. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-19	20%	§19.503 of Regulation #19 and 40 CFR Part 52, Subpart E

60. During periods of source operation, the permittee utilize a continuous opacity monitor (COM) to demonstrate compliance with Specific Condition #59. In lieu of using a COM, and during times when the COM is not functional, the permittee shall conduct daily observations of the opacity from source SN-19 and keep a record of these observations. If the permittee detects visible emissions in excess of the permit limit, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§19.503 of Regulation #19 and 40 CFR Part 52, Subpart E]

61. The permittee shall construct, maintain, calibrate and operate the process monitoring systems specified in Appendix A of this permit - Automatic Waste Feed Shutoff System Parameters, Devices, Cutoff Limits, Actions. Each monitored operating parameter identified in Appendix A shall be continuously monitored and recorded. The kiln feed material, contact water, landfill runoff and leachate shall be charged to a kiln only when all monitoring and recording instruments and devices required by this condition are on-line and operating properly. The kiln feed material, contact water, landfill runoff and leachate shall not be charged to a kiln unless all of the monitored parameters described are within the ranges specified. Upon any occurrence of an interlocked parameter deviating from the allowed range, the monitoring system shall automatically cut off the flow of all waste and aqueous waste feed streams to one, or both, kilns at the levels, and in the manner, specified below. Upon the occurrence of any automatic waste feed shutoff, the affected feeds shall not be restarted until such time as the monitored parameters are within the specified ranges. In the event of a malfunction of the automatic waste feed shutoff system, the permittee shall perform manual shutdowns of all waste feed streams to one or both kilns. Reclaim feeder lines are to be shutdown only if malfunction is associated with their operation. Feeder line and/or kiln waste feed operations shall not be restarted until such time as the problem causing the malfunction has been located and corrected. For those monitored parameters which do not have limits specified, interlocks are not yet required. Compliance with this condition shall be demonstrated by meeting the limits of Appendix A. [§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]
62. The feed material to each kiln shall consist of a blend containing a crushed potliner weight percent of 25-40%. The blend shall be such that the cyanide feed rate does not exceed 105 lbs/hr and the fluoride feed rate does not exceed 2600 lbs/hr. The operator shall continuously monitor the blending of potliner in a manner such that an inability to maintain the required blend ratio shall result in an immediate stop to all reclaim feeders. Compliance with this Specific Condition shall be determined by using the values for concentrations and feedstock densities determined by the sampling and analysis program and the as-fired blend ratio and individual kiln mass feed rates to determine the average pounds constituent per hour. Kiln feed rates used for this calculation shall be those determined in accordance with Specific Condition #64. [§19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

63. The permittee shall not accept for treatment, any material other than the spent potliner, sand, and limestone feedstocks that are specified in this Permit. Contact water generated from routine on-site operations and landfill runoff and leachate from the on-site landfill are also acceptable feedstocks. If sampling and analysis of the kiln discharge residue indicates the need for further reduction in the concentrations of regulated constituents, the discharged residue may be re-introduced to the kiln feed system. Off-specification residuals shall be separately treated and not commingled with untreated spent potliner. If sand or limestone is considered a necessary feedstock for treatment of off-specification kiln residue, the Permittee shall establish and not exceed the minimum feed rate of limestone and sand considered necessary to result in successful treatment. [§19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
64. This permit authorizes the operation of two kilns. Each kiln feed rate, as measured by the associated weight integrator, shall be no greater than 30 tons per hour on a one-hour rolling average. When both kilns are in-service, each kiln is limited to a 30 ton per hour feed rate on a one-hour rolling average such that the total feed rate shall be no greater than 60 tons per hour on a one-hour rolling average. Contact water, landfill runoff and leachate may be introduced to each kiln at a combined rate not to exceed five gallons per minute per each kiln. [§19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
65. The permittee shall maintain records which demonstrate compliance with the throughput limits set in Specific Condition #64. These records may be used by the Department for enforcement purposes. Records shall be updated on a monthly basis, shall be kept on site, and shall be provided to the Department upon request. [§19.705 of Regulation #19 and 40 CFR Part 52 Subpart E]
66. Natural gas fuel feed to each operating kiln shall be continuous. Each natural gas burner shall be equipped with a burner flame detector that initiates an automatic waste feed shutoff in the event of a flameout. [§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]
67. Each rotary kiln shall be operated so that the kiln draft is sufficient to maintain a negative pressure of at least -0.02 in. W.C. A pressure greater than -0.02 in W.C. shall result in an automatic waste feed shutoff to the affected kiln. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
68. The gas flow rate to each kiln induced draft fan shall be continuously monitored and recorded. Loss of power to a kiln induced draft fan shall result in an automatic waste feed shutoff to the affected kiln. [§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]

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69. Use of the water quench shall be considered as an emergency quench and shall result in an automatic waste feed shutoff. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
70. The pressure differential across the off-gas dust collector shall be monitored as described in the approved Alternate Monitoring Application. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
71. Loss of power to either, or both, in-service off-gas dust collector discharge fans shall result in a system-wide automatic waste feed shutoff. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
72. Natural gas firing to each in-service afterburner shall be continuous. Each natural gas burner shall be equipped with a burner flame detector that initiates a system-wide automatic waste feed shutoff in the event of a flameout. [§19.705 of Regulation #19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]
73. Loss of power to any afterburner combustion air supply fan shall result in a system-wide automatic waste feed shutoff. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
74. The internal pressure of each afterburner chamber shall be maintained at no greater than 3 in. W.C. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]
75. Each afterburner shall be operated with an exit gas temperature of no less than 1,750 °F based on an hourly rolling average. An hourly rolling average afterburner exit gas temperature less than 1,750 °F shall result in an automatic waste feed shutoff to the affected kiln. [§19.303 of Regulation #19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

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76. The process off-gas stack shall be equipped with a continuous gas analyzer system that shall continuously monitor and record stack gas opacity and the concentrations of oxygen (O₂) and carbon monoxide (CO) in the gas stream. Monitors used for this purpose shall be designed to actuate a system-wide automatic waste feed shutoff at the concentration limits set in Specific Condition #77 . All CEMs shall be operated in accordance with ADEQ CEM conditions. [§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]
77. The carbon monoxide concentration in the process off-gas stack shall not exceed 100 ppmv, dry gas basis, corrected to 7% O₂. Compliance with this concentration limit shall be based on a rolling one hour averaging time. The monitoring and recording system used to demonstrate compliance with this condition shall continuously monitor, report and record dry gas, oxygen corrected, one hour average concentrations. The hourly rolling average is defined as the arithmetic mean of the 60 most recent 1-minute average values reported. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]
78. As a means of verifying that the material fed to the kiln meets the physical and chemical composition limit specified in this permit, all spent potliner to be treated shall be subject to the sampling and analysis program. A copy of the sampling and analysis program shall be kept on site and made available to Department personnel immediately upon request. The Permittee shall not accept for processing spent potliner with mass concentrations of PAHs exceeding 1200 ppm. [§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]

**SN-20, SN-21, and SN-22
Off-Spec Transfer Dust Collectors**

Source Description

The Off-Spec Transfer Dust Collectors (SN-20, SN-21, and SN-22) control emissions from the off-spec bypass and crossover conveyor. Sources SN-20, SN-21, and SN-22 are subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

79. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
SN-20	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05
SN-21	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05
SN-22	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05

80. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	tpy
SN-20	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
SN-21	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
SN-22	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

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81. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-20	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
SN-21	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
SN-22	7%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

82. The permittee shall conduct weekly observations of the opacity from sources SN-20, SN-21, and SN-22 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-23, SN-24, and SN-25
Product Transfer Dust Collectors**

Source Description

The Product Transfer Dust Collectors (SN-23, SN-24, and SN-25) control emissions from the product transfer conveyor. Sources SN-23, SN-24, and SN-25 are subject to CAM for particulate emissions. Weekly opacity observations are the method used to demonstrate compliance.

Specific Conditions

83. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Source	Pollutant	lb/hr	tpy
SN-23	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05
SN-24	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05
SN-25	PM ₁₀	0.1	0.2
	Lead	3.20E-06	1.40E-05

84. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Source	Pollutant	lb/hr	tpy
SN-23	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
SN-24	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05
SN-25	PM	0.10	0.20
	Ammonia	0.01	0.05
	Antimony Compounds	1.60E-06	7.10E-06
	Arsenic Compounds	2.40E-06	1.00E-05
	Beryllium Compounds	3.80E-06	1.70E-05
	Cadmium Compounds	9.40E-07	4.10E-06
	Chromium Compounds	1.30E-05	5.90E-05
	Polycyclic Aromatic Hydrocarbons	9.00E-06	3.90E-05

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85. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-23	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
SN-24	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311
SN-25	10%	§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

86. The permittee shall conduct weekly observations of the opacity from sources SN-23, SN-24, and SN-25 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18, 40 CFR Part 64, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-26
Secondary Screen Area Dust Collector

Source Description

The Dust Collector for Secondary Screen Area (SN-26) controls emissions from the aluminum separator #1, impact mill feed conveyor, secondary sizing screen, aluminum separator #2, screen #5 recirculating conveyor, roll crusher feed conveyor, roll crusher and collecting conveyor.

Specific Conditions

87. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.5	2.1
Lead	4.80E-05	2.10E-04

88. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.50	2.10
Ammonia	2.94	12.87
Antimony Compounds	2.30E-05	1.00E-04
Arsenic Compounds	3.40E-05	1.50E-04
Beryllium Compounds	5.40E-05	2.40E-04
Cadmium Compounds	1.30E-05	5.70E-05
Chromium Compounds	1.90E-04	8.30E-04
Polycyclic Aromatic Hydrocarbons	1.30E-04	5.70E-04

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89. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-26	7%	§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

90. The permittee shall conduct weekly observations of the opacity from source SN-26 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**SN-27
 Conveyor CV-59**

Source Description

The Dust Collector for Bucket Elevator and Prepared Potliner Screw Conveyor (SN-27) controls emissions from the Prepared Potliner Screw Conveyor, bucket elevator, impact mill discharge conveyor and SPL tripper conveyor.

Specific Conditions

91. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.0
Lead	2.00E-05	8.60E-05

92. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.00
Ammonia	2.94	12.87
Antimony Compounds	1.00E-05	4.40E-05
Arsenic Compounds	1.50E-05	6.60E-05
Beryllium Compounds	2.40E-05	1.10E-04
Cadmium Compounds	5.80E-06	2.50E-05
Chromium Compounds	8.30E-05	3.60E-04
Polycyclic Aromatic Hydrocarbons	5.60E-05	2.50E-04

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93. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method #9

SN	Limit	Regulatory Citation
SN-27	7%	§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311

94. The permittee shall conduct weekly observations of the opacity from source SN-27 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-30
Incinerator Residue Management

Source Description

Fugitive emissions from handling of incinerator residue are generated by truck loading and unloading of processed potliner in transfer to the landfill and by wind erosion.

Specific Conditions

95. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

Pollutant	lb/hr	tpy
PM ₁₀	0.3	1.3
Lead	2.80E-05	1.20E-04

96. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by equipment limitations. [§18.801 of Regulation #18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Pollutant	lb/hr	tpy
PM	0.30	1.30
Antimony Compounds	1.40E-05	6.30E-05
Arsenic Compounds	2.10E-05	9.30E-05
Beryllium Compounds	3.40E-05	1.50E-04
Cadmium Compounds	8.30E-06	3.60E-05
Chromium Compounds	1.20E-04	5.20E-04
Polycyclic Aromatic Hydrocarbons	7.90E-05	3.50E-04

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Reynolds Metals Company 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.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]
3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
7. The permittee must prepare and implement a Startup, Shutdown, and Malfunction Plan (SSM). If the Department requests a review of the SSM, the permittee will make the SSM available for review. The permittee must keep a copy of the SSM at the source's location and retain all previous versions of the SSM plan for five years. [Regulation 19, §19.304 and 40 CFR 63.6(e)(3)]

40 CFR 63, Subpart EEE

8. The Off-Gas Stack (SN-19) is considered an affected source and is subject, but not limited to, the following requirements. [§19.304 of Regulation #19 and 40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants From Hazardous Waste Combustors]
9. Pursuant to §63.1203(a), the permittee shall not discharge or cause combustion gases to be emitted into the atmosphere that contain :
 - A. For dioxins and furans:
 1. Emissions in excess of 0.20 ng TEQ/dscm corrected to 7 percent oxygen; or
 2. Emissions in excess of 0.40 ng TEQ/dscm corrected to 7 percent oxygen provided that the combustion gas temperature at the inlet to the initial particulate matter control device is 400 °F or lower ;
 - B. Mercury in excess of 130 µg/dscm corrected to 7 percent oxygen;
 - C. Lead and cadmium in excess of 240 µg/dscm, combined emissions, corrected to 7 percent oxygen;
 - D. Arsenic, beryllium, and chromium in excess of 97 µg/dscm, combined emissions, corrected to 7 percent oxygen;
 - E. Carbon monoxide and hydrocarbons either:
 1. Carbon monoxide in excess of 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen; or
 2. Hydrocarbons in excess of 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen and reported as propane at any time during the destruction and removal efficiency (DRE) test runs or their equivalent as provided by §63.1206(b)(7);
 - F. Hydrochloric acid and chlorine gas in excess of 77 ppm by volume, combined emissions, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen; and
 - G. Particulate matter in excess of 34 mg/dscm corrected to 7 percent oxygen.

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10. The permittee must achieve a destruction and removal efficiency (DRE) of 99.99% for each principle organic hazardous constituent (POHC) designated under paragraph (c)(3) of this section. The permittee must calculate DRE for each POHC from the following equation: [§63.1203(c)(1), except as provided in paragraph (c)(2) of this section]

$$\text{DRE} = [1 - (\text{W}_{\text{out}}/\text{W}_{\text{in}})] \times 100\%$$

Where:

W_{in} = mass feedrate of one POHC in a waste feedstream; and
 W_{out} = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere

11. The permittee must treat the POHCs in the waste feed that are specified under paragraph (c)(3)(ii) of this section to the extent required by paragraphs (c)(1) and (c)(2) of this section. [§63.1203(c)(3)(i)]
12. The permittee must specify one or more POHCs from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1), excluding caprolactam (CAS number 105602) as provided by §63.60, for each waste to be burned. The permittee must base this specification on the degree of difficulty of incineration of the organic constituents in the waste and on their concentration or mass in the waste feed, considering the results of waste analyses or other data and information. [§63.1203(c)(3)(ii)]
13. The emission standards and operating requirements set forth in this subpart apply at all times except: [§63.1206(b)(1)]
 - A. During periods of startup, shutdown, and malfunction; and
 - B. When hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cutoff for a period time not less than the hazardous waste residence time) and you have documented in the operating record that you are complying with all otherwise applicable requirements and standards promulgated under authority of section 112(e.g., 40 CFR part 63, subparts LLL, DDDDD, and NNNNN) or 129 of the Clean Air Act in lieu of the emission standards under §§63.1203, 63.1204, 63.1205, 63.1215, 63.1216, 63.1217, 63.1218, 63.1219, 63.1220, and 63.1221; the monitoring and compliance standards of this section and §§63.1207 through 63.1209, except the modes of operation requirements of §63.1209(q); and the notification, reporting, and recordkeeping requirements of §§63.1210 through 63.1212.

14. The Administrator will determine compliance with the emission standards of this subpart as provided by 63.6(f)(2). Performance testing, under operating conditions representative of the extreme range of normal conditions, shall be consistent with the requirements of 63.6(f)(2)(iii)(B) and 63.7(e)(1) to conduct performance testing under representative operating conditions. [§63.1206(b)(2)]
15. The Administrator will make a finding concerning compliance with the emission standards and other requirements of the subpart as provided by 63.6(f)(3). [§63.1206(b)(3)]
16. The Administrator may grant an extension of compliance with the emission standards of this subpart as provided by §63.6(i) and §63.1213. [§63.1206(b)(4)]
17. If the permittee plans to change the design, operation, or maintenance practices of the source in a manner that may adversely affect compliance with any emission standard that is not monitored with a CEMS, the following must be followed: [§63.1206(b)(5)(i)]
 - A. The permittee must notify the Administrator at least 60 days prior to the change, unless the circumstances that dictate such prior notice is not reasonably feasible. The notification must include:
 1. A description of the changes and which emission standards may be affected; and
 2. A comprehensive performance test schedule and test plan under the requirements of 63.1207(f) that will document compliance with the affected emission standard(s);
 - B. The permittee must conduct a comprehensive performance test under the requirements of 63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s) and establish operating parameter limits as required under 63.1209, and submit to the Administrator a Notification of Compliance under 63.1207(j) and 63.1210(d); and
 - C. After the change and prior to submitting the notification of compliance, the permittee must not burn hazardous waste for more than a total of 720 hours and only for purposes of pretesting or comprehensive performance testing. The permittee may petition the Administrator to obtain written approval to burn hazardous waste in the interim prior to submitting a Notification of Compliance for purposes other than testing or pretesting. The permittee must specify operating requirements, including limits on operating parameters, that will demonstrate compliance with the emission standards of this subpart based on available information.

18. If the permittee determines that a change will not adversely affect compliance with the emission standards or operating requirements, the permittee must document the change in the operating record upon making such change. The permittee will revise as necessary the performance test plan, Documentation of Compliance, Notification of Compliance, and start-up, shutdown, and malfunction plan to reflect these changes. [§63.1206(b)(5)(ii)]
19. If a DRE test is acceptable as documentation of compliance with the DRE standard, the permittee may use the highest hourly rolling average hydrocarbon level achieved during those DRE test runs to document compliance with the hydrocarbon standard. An acceptable DRE test is any test for which the data and results are determined to meet quality assurance objectives (on a site-specific basis) such that the results adequately demonstrated compliance with the DRE standard. [§63.1206(b)(6)(i)]
20. If during the acceptable DRE test, the permittee did not obtain hydrocarbon emission data sufficient to document compliance with the hydrocarbon standard, the permittee must either: [§63.1206(b)(6)(ii)]
 - A. Perform, as part of the performance test, an “equivalent DRE test” to document compliance with the hydrocarbon standard; or
 - B. Perform a DRE test as part of the performance test.
21. The permittee must document compliance with the DRE standard under this subpart only once, provided that the permittee does not modify the source after the DRE test in a manner that could affect the ability of the source to achieve the DRE standard. [§63.1206(b)(7)(A)]
22. The permittee may use any DRE test data that documents that your source achieves the required level of DRE provided the permittee has not modified the design or operation of the source in a manner that could effect the ability of your source to achieve the DRE standard since the DRE test. [§63.1206(b)(7)(B)]
23. For sources that feed hazardous waste at a location in the combustion system other than the normal flame zone, the permittee: [§63.1206(b)(7)(B)(ii)]
 - A. Must demonstrate compliance with the DRE standard during each comprehensive performance test.
24. For sources that do not use DRE testing performed prior to the compliance date to document conformance with the DRE standard, the permittee must perform DRE testing during the initial comprehensive performance test. [§63.1206(b)(7)(B)(iii)]

25. Any particulate matter and opacity standards or any permit or other emissions operating parameter limits or conditions, including any limitation on workplace practices, that are applicable to hazardous waste combustors to insure compliance with any particulate matter or opacity standard of parts 60, 61, 63, 264, 265, and 266 of this chapter (i.e., any title 40 particulate or opacity standards) applicable to hazardous waste combustor do not apply while the permittee conducts particulate matter continuous emissions monitoring system (CEMS) correlation tests. [§63.1206(b)(8)(i) and (ii)]
26. For provisions of this section to apply, the permittee must develop a particulate matter CEMS correlation test plan that includes the following information. This test plan may be included as part of the comprehensive performance test plan required under §§63.1207(e) and (f): [§63.1206(b)(8)(iii)(A) and (B)]
 - A. Number of test conditions and number of runs for each test condition;
 - B. Target particulate matter emission level for each test condition;
 - C. How you plan to modify operations to attain the desired particulate matter emission levels;
 - D. Anticipated normal emission levels; and
 - E. Submit the test plan to the Administrator for approval at least 90 calendar days before the correlation test is scheduled to be conducted.
27. If the Administrator fails to approve or disapprove the correlation test plan with the time period specified by §63.7(c)(3)(i), the plan is considered approved, unless the Administrator has requested additional information. [§63.1206(b)(8)(iv)]
28. The particulate matter and associated operating limits and conditions will not be waived for more than 96 hours, in the aggregate, for a correlation test, including all runs of all test conditions unless an extension to this limit has been granted prior to the occurrence. [§63.1206(b)(8)(v)]
29. The stack sampling team must be on-site and prepared to perform correlation testing no later than 24 hours after the permittee has modified operation to attain the desired particulate matter emissions concentrations; unless the permittee documents in the correlation test plan that a longer period of conditioning is appropriate. [§63.1206(b)(8)(vi)]
30. The permittee must return to operating conditions indicative of compliance with the applicable particulate matter and opacity standards as soon as possible after correlation testing is completed. [§63.1206(b)(8)(vii)]
31. The permittee must calculate the hazardous waste residence time and include the calculation in the performance test plan under §63.1207(f) and the operating record. The permittee must also provide the hazardous waste residence time in the Documentation of Compliance under §63,1211(d) and the Notification of Compliance under §§63.1207(j) and 63.1210(c). [§63.1206(b)(11)]

32. The permittee must conduct a minimum of three runs of a performance test required under §63.1207 to document compliance with the emission standards of this subpart. [§63.1206(b)(12)(i)]
33. The permittee must document compliance with the emission standards based on the arithmetic average of the emission results of each run, except that the permittee must document compliance with the destruction and removal efficiency standard for each run of the comprehensive performance test individually. [§63.1206(b)(12)(ii)]
34. In lieu of complying with the particulate matter standards under §63.1203, the permittee may elect to comply with the alternative metal emission control requirements provided in §63.1206(b)(14)(ii) Alternative metal emission control requirements for existing incinerators. [§63.1206(b)(14)(ii)]
 - A. You must not discharge or cause combustion gases to be emitted into the atmosphere that contain cadmium, lead, and selenium in excess of 240 µg/dscm, combined emissions, corrected to 7 percent oxygen; and
 - B. You must not discharge or cause combustion gases to be emitted into the atmosphere that contain antimony, arsenic, beryllium, chromium, cobalt, manganese, and nickel in excess of 97 µg/dscm, combined emissions, corrected to 7 percent oxygen.
35. If the permittee elects to comply with the alternative metal emission control requirement, the permittee must not discharge or cause combustion gases to be emitted into the atmosphere that contain cadmium, lead, and selenium in excess of 240 µg/dscm, combined emissions, corrected to 7 percent oxygen, and that contain antimony, arsenic, beryllium, chromium, cobalt, manganese, and nickel in excess of 97 µg/dscm, combined emissions, corrected to 7 percent oxygen. [§63.1206(b)(14)(ii)]
36. The permittee must operate only under the operating requirements specified in the Documentation of Compliance under §63.1211(c) or the Notification of Compliance under §§63.1207(j) and 63.1210(d), except during performance tests under approved test plans according to §63.1207(e), (f), and (g), and under the conditions of §63.1206(b)(1)(i) or (ii). [§63.1206(c)(1)(i)]
37. The Documentation of Compliance and the Notification of Compliance must contain operating requirements including, but not limited to, the operating requirements of this section and §63.1209. [§63.1206(c)(1)(ii)]
38. Failure to comply with the operating requirements is failure to ensure compliance with the emissions standards of this subpart. [§63.1206(c)(1)(iii)]
39. Operating requirements in the Notification of Compliance are applicable requirements for purposes of parts 70 and 71 of this chapter. [§63.1206(c)(1)(iv)]

40. The operating requirements specified in the Notification of Compliance will be incorporated in the Title V permit. [§63.1206(c)(1)(v)]
41. The permittee must identify in the startup, shutdown, and malfunction plan the projected oxygen correction factor based on normal operations to use during periods of startup and shutdown. [§63.1206(c)(2)(iii)]
42. The permittee must record the plan in the operating record. [§63.1206(c)(2)(iv)]
43. Upon the compliance date, the permittee must operate the combustor with a functioning system that immediately and automatically cuts off the hazardous waste feed, except as provided by paragraph (c)(3)(viii) of this section, when the following conditions apply: [§63.1206(c)(3)(i)]
 - A. When any of the following are exceeded: operating parameter limits specified under §63.1209 (with the exception of ash, total chlorine, and metals feedrate limits); an emission standard monitored by CEMS; and the allowable combustion chamber pressure;
 - B. When the span value of any CMS detector, except a CEMS, is met or exceeded;
 - C. Upon malfunction of a CMS monitoring an operating parameter limit specified under §63.1209 or an emission level; or
 - D. When any component of the automatic waste feed cutoff system fails.
44. During an automatic waste feed cutoff (AWFCO) the permittee must continue to duct combustion gases to the air pollution control system while hazardous waste remains in the combustion chamber. [§63.1206(c)(3)(ii)]
45. The permittee must continue to monitor during the cutoff the operating parameters for which limits are established under §63.1209 and the emissions required under that section to be monitored by a CEMS, and the permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within specified limits. [§63.1206(c)(3)(iii)]
46. If the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon exceedance of a parameter required to be interlocked with the AWFCO system under paragraph (c)(3)(i) of this section, the permittee has failed to comply with the AWFCO requirements of paragraph (c)(3) of this section. If an equipment or other failure prevents immediate and automatic cutoff of the hazardous waste fee, however, the permittee must cease feeding hazardous waste as quickly as possible. [§63.1206(c)(3)(iv)]

47. If, after any AWFCO, there is an exceedance of any emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber, the permittee shall investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs and record the findings and corrective measures in the operating record. [§63.1206(c)(3)(v)]
48. For each set of 10 exceedances of an emissions standard or operating requirement while hazardous waste remains in the combustion chamber, excluding residues that may adhere to the combustion chamber surfaces after waste feed is stopped, during a 60-day block period, the permittee must submit to the Administrator a written report within 5 calendar days of the 10th exceedance documenting the exceedances and the results of the investigation and corrective measures taken. [§63.1206(c)(3)(vi)(A)]
49. On a case-by-case basis, the Administrator may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period. [§63.1206(c)(3)(vi)(B)]
50. The AWFCO system and associated alarms must be tested at least weekly to verify operability, unless the permittee documents in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspection will be adequate. At a minimum, the permittee must conduct operability testing at least monthly. The permittee must document and record in the operating record AWFCO operability test procedures and results. [§63.1206(c)(3)(vii)]
51. The permittee may ramp down the waste feedrate of pumpable hazardous waste over a period not to exceed one minute, except as provided by paragraph (c)(3)(viii)(B). If the permittee elects to ramp down the waste feed, the permittee must document ramp down procedures in the operating and maintenance plan. The procedure must specify that the ramp down begins immediately upon initiation of automatic waste feed cutoff and the procedures must prescribe a bona fide ramping down. If an emission standard or operating limit is exceeded during the ramp down, the permittee has failed to comply with the emission standards or operating requirements of this subpart. [§63.1206(c)(3)(viii)(A)]
52. If the automatic waste feed cutoff is triggered by an exceedance of any of the following operating limits, the permittee may not ramp down the waste feed cutoff: Minimum combustion temperature, maximum hazardous waste feedrate, or any hazardous waste firing system operating limits that may be established for the combustor. [§63.1206(c)(3)(vii)(B)]
53. The permittee is subject to the combustion system leak control system operating and reporting requirements set forth in this section. [§§63.1206(c)(5)(i through ii)]
54. The permittee is subject to the operator training and certification standards set forth in this section. [§§63.1206(c)(6)(i through v)]

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55. The permittee must prepare and at all times operate according to an operation and maintenance plan which complies with the requirements set forth in these sections. [§§63.1206(c)(7)(i through iv)]
56. The permittee must conduct performance testing in accordance with the applicable requirements contained in this section. [§§63.1207(a-m)]
57. The permittee must commence the initial comprehensive performance test to demonstrate compliance with the standards under §63.1219 not later than 12 months after the compliance date. [§63.1207(c)(3)]
58. The permittee must conduct testing periodically as described in paragraphs (d)(1) through (3) of this section. The date of commencement of the initial comprehensive performance test is the basis for establishing the deadline to commence the initial confirmatory performance test and the next comprehensive performance test. The permittee may conduct performance testing at any time prior to the required date. The deadline for commencing subsequent confirmatory and comprehensive performance testing is based on the date of commencement of the previous comprehensive performance test. [§§63.1207(d)(1) through (3)]
 - A. The permittee must commence testing no later than 61 months after the date of commencing the previous comprehensive performance test.
 - B. The permittee must commence confirmatory performance testing no later than 31 months after the date of commencing the previous comprehensive performance test. To insure that the confirmatory test is conducted approximately midway between comprehensive performance tests, the Administrator will not approve a test plan that schedules testing within 18 months of commencing the previous comprehensive performance test.
 - C. The permittee must complete performance testing within 60 days after the date of commencement, unless the Administrator determines that a time extension is warranted based on documentation in writing of factors beyond the permittee's control that prevent testing from being completed within 60 days.

59. The permittee must submit to the Administrator a notification of intent to conduct a comprehensive performance test and CMS performance evaluation and a site specific test plan and CMS performance evaluation plan at least one year before the performance test and performance evaluation are scheduled to begin. This notification may be waived if the Administrator has not approved the test plan, or acted on the test plan. [§63.1207(e)(i)]
60. The permittee must submit to the Administrator a notification of intent to conduct the comprehensive performance test at least 60 calendar days before the test is scheduled to begin. [§63.1207(e)(i)(B)]
61. The permittee must submit to the Administrator a notification of intent to conduct a confirmatory performance test and CMS performance evaluation and a test plan and CMS performance evaluation plan at least 60 calendar days before the performance test is scheduled to begin. [§63.1207(e)(ii)]
62. The permittee shall use the test methods contained in this section when determining compliance with the emissions standards of this subpart. [§§63.1208(b)]
63. The permittee is subject to the applicable monitoring requirements contained in these sections. [§§63.1209 (a-r)]
64. The permittee must use either a carbon monoxide or hydrocarbon CEMS to demonstrate and monitor compliance with the carbon monoxide and hydrocarbon standards under this subpart. The permittee must also use an oxygen CEMS to continuously correct the carbon monoxide and hydrocarbon levels to 7 percent oxygen. [§63.1209(a)(1)(i)]
65. The permittee must install, calibrate, maintain, and operate a particulate matter CEMS to demonstrate and monitor compliance with the particulate matter standards under this subpart. However, compliance with the requirements in their section to install, calibrate, maintain, and operate the PM CEMS is not required until such time that the Agency promulgates all performance specifications and operational requirements applicable to PM CEMS. [§63.1209(a)(1)(iii)]
66. The permittee must install, calibrate, maintain, and continuously operate the COMS and CEMS in compliance with the quality assurance procedures provided in the appendix to this subpart and Performance Specifications 1 (opacity), 4B (carbon monoxide and oxygen), and 8A (hydrocarbons) in Appendix B, Part 60 of this chapter. [§63.1209(a)(2)]
67. If a carbon monoxide CEMS is used, the permittee is subject to the provisions of this section if a carbon monoxide exceedance is detected. [§63.1209(a)]
68. If a hydrocarbon CEMS is used, the permittee is subject to the provisions of this section if a hydrocarbon exceedance is detected. [§63.1209(a)]

69. Prior to feeding the material, the permittee must obtain an analysis of each feedstream that is sufficient to document compliance with the applicable feedrate limits provided in this section. [§63.1209(c)(1)]
70. The permittee must develop and implement a feedstream analysis plan and record it in the operating record. [§63.1209(c)(2)]
71. The permittee must submit the feedstream analysis plan to the Administrator for review and approval, if requested. [§63.1209(c)(3)]
72. To comply with the applicable feedrate limits of this section, the permittee must monitor and record the feedrates as described in the feedstream analysis plan. [§63.1209(c)(4)]
73. The requirements of §§63.8(d) (Quality control program) and (e) (Performance evaluation of continuous monitoring systems) apply, except that the permittee must conduct performance evaluations components of the CMS under the frequency and procedures (for example, submittal of performance evaluation test plan for review and approval) applicable to performance tests as provided by §63.1207. [§63.1209(d)(1)]
74. To remain in compliance with the destruction and removal efficiency (DRE) standards, the permittee must establish operating limits during the comprehensive performance test (or during a previous DRE test under provisions of §63.1206(b)(7)) for the parameters included in Plantwide Conditions #75, #76, and #77, unless the limits are based on manufacturer specifications and comply with those limits at all times that hazardous waste remains in the combustion chamber. [§63.1209(j)]
75. The permittee must measure the temperature of each combustion chamber at locations that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee must document the temperature measurement location in the test plan submitted under §63.1207(e). [§63.1209(j)(1)(i)]
76. As an indicator of gas residence time in the control device, the permittee must establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run. [§63.1209(j)(2)(i)]
77. The permittee must establish limits on the total hazardous waste feedrate for each location where hazardous waste is fed. [§63.1209(j)(3)(i)]

78. The permittee must comply with the dioxin and furans emission standard by establishing and complying with the operating parameter limits established in Plantwide Conditions #79 through #82. The permittee must base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications. [§63.1209(k)]
79. The permittee must establish a limit on the maximum temperature of the gas at the inlet to the dry particulate matter control device on an hourly rolling average. The permittee must establish the hourly rolling average limit based on good operating practice and engineering judgment. [§63.1209(k)(1)(i)]
80. The permittee must measure the temperature of each combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee must document the temperature measurement location in the test plan. [§63.1209(k)(2)(i)]
81. As an indicator of gas residence time in the control device, the permittee must establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter which is an appropriate surrogate for residence time. [§63.1209(k)(3)(i)]
82. The permittee must establish limits on the maximum total (pumpable and nonpumpable) waste feedrate for each location where waste is fed. [§63.1209(k)(4)(i)]
83. The permittee must comply with the mercury emission standard by establishing and complying with the operating parameter limits as described in the most recent CPT Report and NOC. [§63.1209(l)]
84. The permittee must comply with the particulate matter emission standard by establishing and complying with the operating parameter limits found in §63.1209(m) of this subpart or an approved Alternate Monitoring application. [§63.1209(m)]
85. The permittee must establish a maximum ash feedrate limit. [§63.1209(m)(3)]
86. The permittee must comply with the semivolatile metal (cadmium and lead) and low volatile metal (arsenic, beryllium, and chromium) emission standards by establishing and complying with the operating parameter limits found in §63.1209(n) or an approved Alternate Monitoring Application. [§63.1209(n)]
87. The permittee must establish a limit on the maximum inlet temperature to the primary dry metals emissions control device on an hourly rolling basis based on good operating practice and engineering judgment. [§63.1209(n)(1)]
88. The permittee must establish feedrate limits for semivolatile metals and low volatile metals. [§63.1209(n)(2)(i)]

89. The permittee must establish operating parameter limits on the particulate matter control device as specified by paragraph §63.1209(m)(1) or an approved Alternate Monitoring Application. [§63.1209(n)(3)]
90. The permittee must establish a limit for the feedrate of total chlorine and chloride in all feedstreams. [§63.1209(n)(4)]
91. The permittee must comply with the hydrochloric acid and chlorine emission standards by establishing and complying with the operating parameter limits found in this subpart. [§63.1209(o)]
92. If the permittee complies with the requirements for combustion system leaks under §63.1206(c)(5) by maintaining combustion chamber zone pressure lower than ambient pressure, the permittee must monitor the pressure instantaneously and the automatic waste feed cutoff system must be engaged when negative pressure is not maintained. [§63.1209(p)]
93. The permittee shall submit all of the applicable notifications prior to the deadlines established in this subpart. [§63.1210(a)(1)]
94. The permittee must submit the required notifications outlined in this section to the Administrator in order to request or elect to comply with the alternative requirements contained in this subpart. [§63.1210(a)(2)]
95. Upon postmark of the Notification of Compliance, the operating parameter limits identified in the Notification of Compliance, as applicable, shall be complied with, the limits identified in the Document of Compliance or a previous Notification of Compliance are no longer applicable. [§63.1210(d)(2)]
96. The permittee may request an extension of the compliance date to install pollution prevention or waste minimization controls provided that the conditions outlined in this section are met. [§63.1213]

Title VI Provisions

97. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [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 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.
98. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
- 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.
99. 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.
100. 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.
101. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

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102. 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 the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated November 10, 2004.

Applicable Regulations

Source No.	Regulation	Description
Facility	40 CFR 63, Subpart EEE	National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated November 10, 2004.

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Inapplicable Regulations

Source No.	Regulation	Description
SN-19	40 CFR 64 CAM Rule	Subject to MACT (40 CFR 63, Subpart EEE) which governs emissions monitoring requirements
SN-19	40 CFR 60, Subpart F Cement Kiln NSPS	These units superficially resemble cement kilns but are not engaged in the manufacture of Portland cement.
Facility	40 CFR 60, Subpart OOO Nonmetallic Mineral Processing	Spent potliner is not a "nonmetallic mineral" since the majority of the SPL is carbon material.

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated November 10, 2004.

Description	Category
Five Diesel Fuel Storage Tanks - 4000, 2 @ 3000, 2000 and 1000 gallon capacity.	Group A, #3
Gasoline Storage Tanks #1 and #2 (SN-28)	Group A, #3
Laboratory Dust Collector and Vent	Group A, #5
Lime Handling Fugitives (SN-29)	Group A, #13
Cooling Tower	Group A, #13
Cooler Conveyor Dust Collector	Group A, #13
Leachate Tanks	Group A, #13
Loading Silos	Group A, #13
Air Duct Systems	Group A, #13
Initial Size Reduction System	Group A, #13
Loadout Inline Dust Collector (SN-31)	Group A, #13

SECTION VIII: GENERAL PROVISIONS

1. 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. [40 CFR 70.6(b)(2)]
2. 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. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective September 26, 2002]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will 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. [Regulation 26, §26.406]
4. 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, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing 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.

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6. The permittee must retain the records of all required monitoring data and support information for at least five (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. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

Arkansas Department of Environmental Quality

Air Division

ATTN: Compliance Inspector Supervisor

Post Office Box 8913

Little Rock, AR 72219

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in Regulation 19, § 19.601), the permittee will make an initial report 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:
 - i. The facility name and location
 - ii. The process unit or emission source deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee 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 the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will 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. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
10. 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, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]
11. 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 to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

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14. The permittee must 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 must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]
17. If the permit allows 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 operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]
19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]
 - 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 required 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

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- d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]
 - 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;
 - e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]
 - a. The provisions of Section 303 of the Act (emergency orders), including 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. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

APPENDIX A

APPENDIX B

APPENDIX C

