Enclosure 1 Information Collection Request for Secondary Aluminum Production National Emission Standards for Hazardous Air Pollutants (NESHAP)

Part A. Applicability

manager, plant engineer or supervisor.

If the facility is permanently closed or is not subject to 40 CFR part 63, subpart RRR, please complete this page, sign below and send this page certified mail to the non-CBI address listed on the instruction sheet by XXX. If the facility is subject to 40 CFR part 63, subpart RRR, please continue with the survey and submit responses by XXXX.

Part !	B. Facility	/ Information			
1.	Name an	d address of legal	OWNER of the facility	y:	
2.	Name an	d address of legal	OPERATOR of the fac	cility, if different fro	om the legal OWNER
3.	a. Addrb. City:c. State:d. Zip:			ion):	
4.	a. Addr b. City: c. State:	ess:	the facility if different	from physical locat	
5.	a. Nameb. Title:c. Telepd. Fax n	e (First Name, Las bhone number: number:	wer technical questions t Name):	ext	
	ify that this	facility is permane	ently closed or is not su	bject to the National	Emission Standards for 0 CFR part 63, subpart RRR.
(Print	Name)	(Title)	(Signature of Resp	onsible Official)	(Date)
A Resp	onsible Officia	ıl can be the president, v	ice-president, secretary, or trea	asurer of the company that	owns the facility, owner of the facility

6.	What is the facility size classification for hazardous air pollutant (HAP) emissions? <i>(CHECK one)</i>
	EPA Major Source of Hazardous Air Pollutants (HAP):
	EPA Area source (based on potential to emit) of HAP: EPA Area source (Synthetic Minor)¹ of HAP:
7.	Facility NAICS codes Note: The primary NAICS code represents the line of business that generates the most income for the facility a. Primary NAICS code
	b. Other facility NAICS codes:
8.	Company Size – (CHECK one)
	Note: Approximate average number of all employees (worldwide) of the business enterprise that owns this facility, including where applicable, the parent company and all subsidiaries, branches, and unrelated establishments owned by the parent company: If your company has a primary NAICS code that does not begin with "331," please also include your average annual sales receipts \$
	(How to calculate average annual receipts and average employment of a firm can be found in 13 CFR § 121.104 and 13 CFR § 121.106, respectively).
	≤ 50 51-100 101-500 501-750 751-1000 >1000
9.	Facility Size – (CHECK one)
	Note: Approximate average number of all employees at facility in location identified in question #3 above.
	>1000
10.	Is the legal owner a small entity as defined by the Regulatory Flexibility Act? (CHECK one) Yes No
	Note: For private businesses, small entity is defined for each NAICS of the owning entity based on number of employees and/or company revenue. The NAICS codes used for Secondary Aluminum production are 331312, 331314, 331315, 331316, 331319, 331521, 331524 and various codes used for operations with Sweat Furnaces. The small business size standards for NAICS subsectors are located at the following link: http://www.sba.gov/contractingopportunities/officials/size/table/index.html

Note 1: Synthetic Minor facilities are facilities that have taken a voluntary emission limit or cap to avoid becoming a major source.

. Federal	and State rule/permit coverage.	(CHECK all that apply to this facility).
Su	bpart RRR (Secondary Aluminur	n)
	Diecasting Operations	,
•	Foundry	
•	Extruder	
S11	bpart LL (Primary Aluminum)	
5u		Other (CDECIEV ville name and subnart)
		Other (SPECIFY rule name and subpart)
		Other (SPECIFY rule name and subpart)
NT C		
new Sc	ource Performance Standards (NSI	
		(SPECIFY rule name and subpart)
		(SPECIFY rule name and subpart)
m.1 57		
Title V	(SPE	ECIFY the basis for your Title V permit)
	ir Toxics:	
		(SPECIFY rule name and subpart)
		(SPECIFY rule name and subpart)
Other M	ACT (e.g., Metal Coil Surface C	oatings MACT):
		(' \) Y
Other M	1ACT:	(SPECIFY emission unit and rule)
Repres	entative Facility Production Hours	S:
a F	Hours/day:	
h I	Days/week:	
c V	Veeks/year:	-
c. v	Total production hours per year (a	- v b v c)
u. 1	otal production hours per year (a	x u x c)
Total	mount of aluminum produced in 5	2009. If 2009 is not representative of normal operations, please
		year (2004 or later) and specify the year.
provide		year (2004 of later) and specify the year.
	Year	
	Tons of alumin	num produced
Amour	t of total charge to the facility use	ed to produce the amount of aluminum reported in question #13:
	Tons of charge	
	Tons or charge	-
Dlasca	provide a copy of a schematic of t	the plant layout for equipment subject to subpart RRR, control
	1	with these units. Drawings can be handwritten as illustrated in
	. •	<u>e</u>
		he unit IDs, control device IDs, and stack IDs, which should
		Ds, and stack IDs used to respond to later questions. Please
properl	y identity units that are permanen	tly "out of service" or not yet installed.

10.		ailable, and indicate items provided below.
(СНЕС	CK	all items provided):
		Title V permit
		State Air Operating permit
		Pending air permit applications (except for state and Title V renewal applications)
		Performance test reports (submit most recent test reports for each subpart RRR related process).
		This includes any test data on air emission sources, e.g. HF testing, bag house dust analyses, etc., no
		previously submitted to our office under a section 114 request.
		Emission inventory reports (reporting years should be the same as the years selected for this
		survey)
		Most recent consent decree or order for air related issues
		Notice(s) of air operating permit violations for the past 3 years
		Startup, shutdown, and malfunction (SSM) plan
		Operating, maintenance, and monitoring plan (OM&M)

Part C. Facility Equipment Regulated under Subpart RRR (Secondary Aluminum NESHAP) *Please provide the information below for all equipment at your facility:*

17. Regulated Equipment List

Unit Identification Numbers (Unit ID No.)	Unit ID No. as Designated in Title V or State Operating Permit*	Subpart RRR Equipment	Do You Have This Equipment at the Facility? (Y or N)	Add-on Controls (Y or N)	Operating in 2009? (Y or N) If "No," list last year of operation
		Aluminum Scrap Shredder			
		Thermal Chip Dryer			
		Scrap Dryer/Delacquering/ Decoating Kiln			
		Group 1 Furnace- Clean charge only**			
		Group 1 Furnace- Handling other than clean charge**		, ,	
		Group 2 Furnace**			
		In-line Fluxer			
		Dross-only Furnace			
		Rotary Dross Cooler			
		Sweat Furnace			

^{*} Please complete this column if ID numbers used in this form are different from those in the permit.

^{**} Please indicate which of the Group 1 or Group 2 furnaces listed above that have sidewells.

Part D. Charge Rates and Controls Used for Major Sources Subpart RRR MACT

Please provide the information below for all regulated equipment at your facility; Use information for this section from whichever year (2004 or later) is representative of normal emissions per ton of production.

______ (please specify year). For batch processes, the charge rate should be calculated as the total charge divided by the duration of the performance test.

For purposes of this section, "Maximum Capacity" of a unit is defined as the unit's potential to process charge or produce aluminum at its maximum rate on mass/time basis. If your permit limits the throughput or output of the unit, then that permitted amount may be used to calculate the maximum capacity.

18. For Each Scrap Shredder

Unit ID No.	Amount of Charge (tons/yr)	Maximum Capacity of Unit (tons/yr)	Charge Rate During Most Recent Performance Test (lbs/hr)*	Control Device Device Type ID No.
				Z

19. For Each Thermal Chip Dryer

			Charge Rate	Control Device	
Unit ID No.	Amount of Chips Charged	Maximum Capacity of Unit (tons chips/yr)	During Most Recent Performance Test	Tyme	Device ID No.
INU.	(tons/yr)	(tons chips/yr)	(lbs/hr)*	Туре	ID No.
	6 0				

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.

20. For Each Scrap Dryer/Delacquering Kiln/Decoating Kiln

		Maximum	Charge Rate	Control Device**	
Unit ID No.	Amount of Charge (tons/yr)	Capacity of Unit (tons/yr)	During Most Recent Performance Test (lbs/hr)*	Type	Device ID No.

^{**}If the kiln is equipped with an afterburner operated at a minimum of 760°C (1400°F), with a design residence time of 1 second minimum, enter the control device ID Nos. here:

21. For Each Dross Only Furnace

			Charge Rate During	Contro	l Device
Unit ID No.	Amount of Dross Charged (tons/yr)	Maximum Capacity of Unit (tons dross/yr)	Most Recent Performance Test (lbs/hr)*	Туре	Device ID No.
		3 /		31	
			Y		

22. For Each Rotary Dross Cooler

	_	Maximum Capacity of Unit (tons dross/yr)	Charge Rate During	Control Device	
Unit ID No.	Amount of Dross Charged (tons/yr)		Most Recent Performance Test (lbs/hr)*	Туре	Device ID No.
	. (
		Y			

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.

23. For Each Group 1 Furnace

			Maximum	Charge Rate During	Contro	l Device
Unit ID No.	Amount of Charge (tons/yr)	Only Clean Charge (yes/no)	Capacity of Unit (tons/yr)	Most Recent Performance Test (lbs/hr)*	Туре	Device ID No.
					4	

24. For Each Group 2 Furnace

Unit ID	Amount of Charge	Maximum Capacity of Unit	Charge Rate During Most Recent Performance Test	Contro	Device
No.	(tons/yr)	(tons/yr)	(lbs/hr)*	Type	Device ID No.
			, 1		

25. For Each In-line Fluxer

				Charge Rate	Control Device		
	_	Maximum	Maximum	During Most			
	Amount of	Capacity of	Number of Times	Recent			
Unit ID	Charge	Unit	the Unit Can Run	Performance Test		Device ID	
No.	(tons/yr)	(tons/yr)	in a 24-hr Period	(lbs/hr)*	Type	No.	
			/				
	A 6						
		/ /					

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.

26. For Each Sweat Furnace

		Maximum	Charge Rate During	Control 1	Device**
Unit ID No.	Amount of Charge (tons/yr)	Capacity of Unit (tons/yr)	Most Recent Performance Test (lbs/hr)*	Туре	Device ID No.
				A 4	

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units. If no performance test was conducted, it is not necessary to fill out this column.

** If the sweat furnace is equipped with an afterburner operated at a minimum of 1600°F, with a design residence time of 0.8 second minimum, enter the control device ID here:

- 27. For Each Secondary Aluminum Processing Unit (SAPU) Using Emissions Averaging (as per section 63.1505(k))
 - a. Complete this table if your facility chose to measure compliance using the *weight of the feed/charge*.

SAPU Unit ID No.	Unit Nos. from Questions #23 and #25 making up the SAPU(s)	SAPU Type? N=New E=Existing	Amount of Feed/Charge (tons/year)	Percent Clean Charge (approximate)
	\(\frac{1}{2}\)			

b. Complete this table if your facility chose to measure compliance using the *weight of the aluminum produced*.

SAPU Unit ID No.	Unit Nos. from Questions #23 and #25 making up the SAPU(s)	SAPU Type? N=New E=Existing	Amount of Aluminum Produced (tons/year)	Percent Clean Charge (approximate)

Part E. Charge Rates and Controls Used for Area Sources Subpart RRR MACT

Please provide the information below for all regulated equipment at your facility;	Use information for this secti	on from 2004 or later,
whichever year is representative of normal emissions per ton of production	(please specify year).	For batch processes, the
charge rate should be calculated as the total charge divided by the duration of the	performance test.	

For purposes of this section, "Maximum Capacity" of a unit is defined as the unit's potential to process charge or produce aluminum at its maximum rate on mass/time basis. If your permit limits the throughput or output of the unit, then that permitted amount may be used to calculate the maximum capacity.

28. For Each Thermal Chip Dryer

	Amount of Chips	Maximum	Charge Rate During Most	Control Device		
Unit ID No.	Charged (tons/yr)	Capacity of Unit (tons/yr)	Recent Performance Test (lbs/hr)*	Туре	Device ID No.	

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.

29.	For Each S	crap Drver	/Delacquering	g Kiln/Decoating	Kiln
				,	,

		Maximum	Charge Rate During Most	Control 1	Device**
Unit ID No.	Amount of Charge (tons/yr)	Capacity of Unit (tons/yr)	Recent Performance Test (lbs/hr)*	Туре	Device ID No.
				AYY	
				Y	
			4		
			4		

^{**}If the kiln is equipped with an afterburner operated at a minimum of 760°C (1400°F), with a design residence time of 1 second minimum, enter the control device ID Nos. here: ______

30. For Each Group 1 Furnace

				Charge Rate During	Control Device	
Unit ID No.	Amount of Charge (tons/yr)	Only Clean Charge (yes/no)	Maximum Capacity of Unit (tons/yr)	Most Recent Performance Test (lbs/hr)*	Туре	Device ID No.

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.

31. For Each Sweat Furnace

			Charge Rate During	Control 1	Device**
Unit ID	Amount of Charge	Maximum Capacity of Unit	Most Recent Performance Test		
No.	(tons/yr)	(tons/yr)	(lbs/hr)*	Type	Device ID
				Y	
				Y	

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units. If no performance test was conducted, it is not necessary to fill out this column.

** If the sweat furnace is equipped with an afterburn	ier operated at	a minimum o	f 1600°F,	with a design i	residence time o	of 0.8 second
minimum, enter the control device ID here:						

32. For Each In-line Fluxer

				Charge Rate	Contro	l Device
			Maximum Number	During Most		
	Amount of	Maximum	of Times the Unit	Recent		
Unit ID	Charge	Capacity of Unit	Can Run in a 24-hr	Performance Test		
No.	(tons/yr)	(tons/yr)	Period	(lbs/hr)*	Type	Device ID No.

^{*} If more than one performance test was conducted to demonstrate operation with different types of charge, please enter the maximum charge rate. If a test on a representative unit was conducted to demonstrate compliance for similar units, please enter the charge rate during the test used to demonstrate compliance for untested units.



- 33. For each Secondary Aluminum Processing Unit (SAPU) Using Emissions Averaging (as per section 63.1505(k))
 - a. Complete this table if your facility chose to measure compliance using the weight of the feed/charge.

SAPU Unit ID No.	Unit ID Nos. from Questions #30 and #32 making up the SAPU(s)	SAPU Type? N=New E=Existing	Amount of Feed/Charge (tons/year)	Percent Clean Charge (approximate)
				4
				4

b. Complete this table if your facility chose to measure compliance using the *weight of the aluminum produced*.

SAPU Unit	Unit ID Nos. from Questions #30 and #32 making up the	SAPU Type? N=New	Amount of Aluminum Produced	Percent Clean Charge
ID No.	SAPU(s)	E=Existing	(tons/year)	(approximate)

34. Please complete this table for any *scrap shredder*, *group 2 furnace*, *in-line fluxer*, *dross-only furnace*, *or rotary dross cooler* present at your facility.

			What Type of		Disch	arge				Flow Rat	e (SCFM)
Unit ID No.	Type of Equipment	Maximum Capacity* (tons/year)	Control Device, if Any is Used?	Stack or Discharge (ft)	Diameter (ft)	Area (sq. ft.)	Exit Gas Temperature (degrees F)	Latitude**	Longitude**	Maximum	Minimum

^{*} For purposes of this section, "Maximum Capacity" of a unit is defined as the unit's potential to process charge or produce aluminum at its maximum rate on mass/time basis. If your permit limits the throughput or output of the unit, then that permitted amount may be used to calculate the maximum capacity.

^{**} Longitude and Latitude should be specified in degrees to 6 decimal places, e.g. 38.893864,-77.028097. A handheld GPS device or mobile device with GPS capability can be used to determine these values. If coordinates are not known, please provide a scaled site diagram, with a latitude/longitude reference point, indicating stack locations.

Part F. Emissions and Limits for Subpart RRR Sources and Non-Subpart RRR Sources
Please provide the information below for all equipment at your facility; Use information for this section from 2004 or later, whicheve
year is representative of normal emissions per ton of production (please specify year)

For purposes of this section, "Maximum Capacity or Maximum Allowable" of a unit is defined as the unit's potential to process charge or produce aluminum at its maximum rate on mass/time basis. If your permit limits the throughput or output of the unit, then that permitted amount may be used to calculate the maximum capacity.

35. a. Please list all <u>regulated pollutant emissions</u> from equipment subject to 40 CFR 63, subpart RRR.

		Emiss		nted RRR Pol ormance Tes	llutants Based on ts	Control I (from Part C o	List Dates of the	
Unit ID No.	Emissions Unit Name	PM (lbs./ton)	D/F** (grain/ton)	HCl (lbs./ton)	Total Hydrocarbons (THC) (lbs./ton)	Device Type*	Unit ID No.	Applicable Compliance Tests
					,			
			. (> \ ′				

^{*} If you comply with subpart RRR requirements for sweat furnaces by controlling your afterburner residence time, enter "AB/RT" in the table.

^{**}Please include dioxin/furan congeners data from Method 23. Use additional lines to break these out, if necessary.

b. Please list <u>all other HAP</u> emissions from equipment <u>subject to 40 CFR 63</u>, <u>subpart RRR</u>. (Please include fugitive emissions.)

Equipment/Process Description	Unit ID No.	List Each Individual HAP	CAS#	Emission Rate (lbs./yr)	Maximum Allowable (lbs./yr)	Maximum Allowable (lbs./hr)	Emission Factor Type**

c. Please list estimated HAP emissions from collocated sources that are <u>not regulated under 40 CFR 63</u>, <u>subpart RRR</u>. (Please include fugitive emissions.) *Do not include Primary Aluminum Sources*. Gas fired equipment (such as preheater boxes and annealing furnaces, etc.) not regulated under 40 CFR 63, subpart RRR may be combined into a single entry.

Equipment/Process Description	Unit ID No.	List Each Individual HAP*	CAS#	Emission Rate* (lbs./yr)	Maximum Allowable (lbs./yr)	Maximum Allowable (lbs./hr)	Emission Factor Type**

^{*} Copies of test data reports for your HAP emissions from non-subpart RRR sources are not required. HAP emissions data previously submitted for Primary Aluminum are not required. Please include all others HAP emissions.

** Emission Factor Type:

- **1**= Emissions calculated based on source test or other emissions measurements.
- **2**= Emissions calculated based on material balance using engineering knowledge of the process.
- **3**= Emissions calculated based on AP-42 or EPA 450/2-90-011 or other EPA emission factor.
- **4**= Emissions calculated by engineering judgement. (Approved by the State agency)
- **5**= Emissions calculated based on a state or local agency emission factor.

Part G. Detailed Control Device and Emission Release Information for Subpart RRR MACT Sources and Other Collocated Sources Emitting <u>Hazardous Air Pollutants (HAP)</u>

Use information for this section from 2004 or later, whichever year is representative of normal emissions per ton of production. _____ (please specify year)

36. a. Add-on air pollution control devices (use multiple lines if the same control device is used to control more than one pollutant). *Please provide the information below for subpart RRR MACT sources.*

_	Control Devices							led
Device Type*	Device ID No.	Pollutant Controlled	Capture Efficiency (if known) (percent)	Control Device Efficiency (if known) (percent)	Overall Efficiency (if known) (percent)	Methods Used for Determining Capture & Control Efficiencies**(a-c)	Type(s) of Unit	Unit ID No.
				. ()				

^{*} For example, afterburner, lime coated fabric filter, etc.

- a = Testing (specify method)
- b = Manufacturer's Specifications
- c = Engineering Estimate

Please provide any additional information concerning the Control Devices:

^{**} Control & Capture Efficiency

b. Add-on air pollution control devices (use multiple lines if the same control device is used to control more than one pollutant). (Do not include Primary Aluminum Sources)

Please provide the information below for sources not subject to subpart RRR MACT:

	•	,	Control Dev	ices			Units Controlled	
Device Type*	Device ID No.	Pollutant Controlled	Capture Efficiency (if known) (percent)	Control Device Efficiency (if known) (percent)	Overall Efficiency (if known) (percent)	Methods Used for Determining Capture & Control Efficiencies**(a-c)	Type(s) of Unit	Unit ID No.
					A)	<u> </u>		

^{*} For example, afterburner, lime coated fabric filter, etc.

- a = Testing (specify method)
- b = Manufacturer's Specifications
- c = Engineering Estimate

Please provide any additional information concerning the Control Devices:

^{**} Control & Capture Efficiency

37. a. For each stack/control device exhaust point, please provide the following information, if known, related to the information in Item #36a above. (Subpart RRR MACT Sources.)

Unit	What Control Devices are Vented	Height of stack	Discha Diameter	Area	Exit Gas Temperature				e (SCFM)
ID No.	at this Point?	or discharge (ft)	(ft)	(sq. ft.)	(degrees F)	Latitude*	Longitude*	Maximum	Minimum

^{*} Longitude and Latitude should be specified in degrees to 6 decimal places, e.g. 38.893864,-77.028097. A handheld GPS device or mobile device with GPS capability can be used to determine these values. If coordinates are not known, please provide a scaled site diagram, with a latitude/longitude reference point, indicating stack locations.

b. For each stack/control device exhaust point, please provide the following information, if known, related to the information in Item #36b above. (Non-Subpart RRR MACT Sources.) *Do not include Primary Aluminum Sources*. If emissions from gas fired equipment were combined in question 35c and discharged through different stacks, please estimate the fraction of the discharge emitted through each stack.

	What Control		Discharge		Exit Gas				Flow Rate (SCFM)	
Unit ID No.	Devices are Vented at this Point?	Height of stack or discharge (ft)	Diameter (ft)	Area (sq. ft.)	Temperature (degrees F)	Latitude*	Longitude*	Maximum	Minimum	
		AV	1							
	1	V V								
		> >								

^{*} Longitude and Latitude should be specified in degrees to 6 decimal places, e.g. 38.893864,-77.028097. A handheld GPS device or mobile device with GPS capability can be used to determine these values. If coordinates are not known, please provide a scaled site diagram, with a latitude/longitude reference point, indicating stack locations.

38. a. For each exhaust point/stack <u>not associated with a control device for Subpart RRR MACT Sources</u>, please provide the following information:

	What Process		Disch	arge	Exit Gas			Flow Rate	e (SCFM)
Unit ID No.	Exhausts are Vented at this Point?	Height of Stack or Discharge (ft)	Diameter (ft)	Area (sq. ft.)	Temperature (degrees F)	Latitude*	Longitude*	Maximum	Minimum

^{*} Longitude and Latitude should be specified in degrees to 6 decimal places, e.g. 38.893864,-77.028097. A handheld GPS device or mobile device with GPS capability can be used to determine these values. If coordinates are not known, please provide a scaled site diagram, indicating stack locations.

b. For each exhaust point/stack <u>not associated with a control device for Non-Subpart RRR MACT Sources</u>, please provide the following information: (*Do not include Primary Aluminum Sources*.)

	What Process		Disch	arge	Exit Gas			Flow Rate	e (SCFM)
Unit ID No.	exhausts are Vented at this point?	Height of Stack or Discharge (ft)	Diameter (ft)	Area (sq. ft.)	Temperature (degrees F)	Latitude*	Longitude*	Maximum	Minimum
)						

^{*} Longitude and Latitude should be specified in degrees to 6 decimal places, e.g. 38.893864,-77.028097. A handheld GPS device or mobile device with GPS capability can be used to determine these values. If coordinates are not known, please provide a scaled site diagram, indicating stack locations.

39. For each affected source listed in [Section B, above], identify the date(s) of latest NESHAP compliance testing.

Date	Emissio	n Unit	Test Method	Pollutant(s)	Emission Rate	
Tested	Unit Type	Unit ID No.	Used	Tested	(Specify Units)	

a. For each Group 1 furnace for which a performance test was conducted:

Furnace ID*			
ID of other furnaces for which this test			
was used to determine representative			
emission rates			Y
Is this furnace operated continuously or			Ť
batch-by-batch?			
Does the furnace process metal other			
than clean charge?			
How many runs were included in the		$\wedge V$	
test?			
What was the length of each			
performance test run?			
How many minutes during each run was			
the charging door open?	, , ,		
What steps were taken during the test to			
minimize air emissions escaping from			
the furnace doors, etc.?			
What period of time during each run was			
metal tapped from the furnace?			
Is this a sidewell (scrapwell) furnace?			
Is this a melting or holding furnace?			

^{*} Where two or more co-controlled furnaces were tested simultaneously, list all furnace IDs.

b. For each side well (scrap well) furnace

Furnace ID		
Was reactive flux used in the sidewell,		
hearth, both, or neither?		
Was the level of molten metal		
maintained above the top of the passage		
between the sidewell and hearth		
continuously?		
Was the level of molten metal		
maintained above the top of the passage		
between the sidewell and hearth during		
periods of reactive fluxing?		
How was the molten metal level		
monitored?		

c. For each Group 1 furnace *that is not ducted to a control device*:

Furnace ID			
Is the furnace equipped with a hood or		7	
other type of enclosure as part of the	()		
emissions collection system?	Y		
If yes, please describe.			
What steps were taken during the test			
to minimize emissions from the			
furnace doors, etc.?			
Were visible emissions monitored			
during the performance test?			
Were visible emissions observed			
during the performance test?			

d. For each Group 1 furnace that is *ducted to a control device*:

Furnace ID		
Is the furnace equipped with a capture		
system to limit fugitive emissions?		
If yes, please describe.		
Are visible emissions present during		
charging?		
What, if any, monitoring and		
inspection is conducted to minimize		
leakage from the duct leading to the		
control device?		
What steps were taken during the test		
to minimize air emissions escaping		
from the furnace doors, etc.?		

e. For each thermal chip dryer, scrap dryer/delacquering kiln/decoating kiln, sweat furnace, dross only furnace and rotary dross cooler:

Equipment ID & Type	
Is this unit equipped with a hood or	
other capture devices as part of the	
emissions collection system?	
If yes, please describe.	
Were visible emissions monitored	
during the performance test?	
Were visible emissions observed	
during the performance test?	
Are visible emissions present during	
loading and unloading of the unit?	
What steps were taken during the test	
to minimize air emissions escaping	
from the furnace doors, etc.?	
40. For affected sources at your facility subject to	to submout DDD that are dusted to add on

40. For affected sources at your facility subject to subpart RRR that are ducted to add-on control devices:

a. Are these sources equipped with capture systems designed and installed in accordance
with the standard (i. e. sections 3 and 5 of the ACGIH manual)?
b. What design parameters were measured to confirm this?
c. What, if any, modifications to the capture systems of existing sources were made to
demonstrate compliance with this standard (e.g. extending hoods, increasing exhaust rate,
· · · · · · · · · · · · · · · · · · ·
modifying operating procedures, etc.)?
_ (<i>> ></i>
d. Were there any problems that were encountered during the permitting process or
operation of your facility due to the way the rule is written in subpart RRR?
operation of your racinty due to the way the rate is written in subpart fixer.
7

Part H. Facility Operations

- 41. General Questions for Subpart RRR MACT Sources
 - a. What type of pretreatment (including, but not limited to air drying, centrifugal drying, etc.) takes places to get the charge ready for processing?
 - b. Do you track the amount of aluminum produced as well as the amount of charge?
 - c. Could you develop and report your emission rates in terms of amount of emissions per unit of aluminum produced? If not, what prevents you from doing so?
 - d. How do you ensure that the molten metal in the side well furnace remains above the top of the passage between the side well and the hearth during reactive fluxing (e.g. record in a logbook based on visual observation by operator, level indicator connected to data recorder, float connected to door interlock, etc.)?

- 42. Fluxing for Subpart RRR MACT Sources
 - a. What reactive or halogenated fluxes were used during the representative year used in Part F? Halogenated fluxes are those fluxes containing fluorine, chlorine, and bromine (e.g. a flux containing NaF). Please attach a Material Safety Data Sheet (MSDS) for each flux listed:

Flux Identification	Flux Still in Use? (Yes or No)	Reactive = R Non-reactive = N	Mass Used (lbs./yr)	Furnace or In-line Fluxer ID in which Flux was Used	Purpose (e.g., cover, degassing, demagging, etc.)

b. What was the total mass of all fluxes (including fluxes that do not contain halogens) used during the representative year used in Part F?

Unit No		Type/Description	Device ID. No.	Total Capital Investment	Maintenance Costs	Operating Costs			
	>	Control 1	Device		Total Annual Operating and	Base Year for			
For the	con	ntrol technologies ident	ified in question 4	3a above, pleas	se provide cost ir	formation:			
		this facility for equipm							
		Please provide details than fabric filters, lime particulate matter or H	-coated fabric filt	ers, or afterbur	ners), <u>monitorin</u>	g (including			
43.		ernative controls, moni irces	toring, or operatin	g conditions fo	or Subpart RRR I	MACT			
		charge Maxim What fr		ogen fluoride e ine content of	mitted the flux used was				
			um tons/yr of hyd of hydrogen fluor			os. HF/ton			
	If so, please provide the data reports or other supporting data for the following:								
	f.	Do you have any hydr	ogen fluoride emis	ssions data for	Subpart RRR MA	ACT Sources?			
	e.	What are your flux rate operating and monitoring procedures?							
			Do you use different types or quantities of flux for different flux applications? If so, now do the procedures differ?						
	C.	If you have side well (and the hearth? If so,							
		-0 1 11	110.0	1. 1					

	b.	Have you injected activated carbon or other type of sorbent for HAP control (excluding research efforts)? What barriers do you envision to adding carbon injection to fabric filters for HAP control (check as many as apply)?								
		 □ Cost of activated carbon □ Creates problems with disposal of material collected by baghouse □ Other (specify): 								
	c.	Do you use catalytic filters for dioxin control (e.g., http://www.donaldson.com/en/industrialair/literature/051754.pdf)?								
	d.	d. Do you have any plans to install any new higher efficiency rated control devices or have any pending applications to add on any new controls? If so, please specify and include any copies of pending permit applications as requested in Part A, item #16.								
	e.	Do you have any plans to use any alternative monitoring or operating conditions? If so, please provide details:								
	-									
	-									
44.	Po	ution prevention for Subpart RRR MACT sources								
	A. to	Describe any procedures , work practice standards , or materials used at your revent or reduce emissions of Hazardous Air Pollutants (HAP). For example, do you n-halogenated fluxes or procedures to prevent HAP formation (in contrast to								
		HAP after it is formed)?								

Part I. Startup and Shutdown for Subpart RRR MACT Sources

45. For each startup and shutdown event for which you did not follow your Startup/Shutdown plan or that resulted in an exceedance of any applicable emission limitation during the past 2 years, please provide the requested information in the table below. If this information is contained in periodic and immediate SSM reports (either stand-alone or contained within the periodic excess emissions report) submitted to your permitting authority, you may submit copies of those reports instead. Please provide any emissions data during startup or shutdown, if available.

C. (C) (1 4 1 4					
Startup/Shutdown*			4		
Description of the event, including					
identification of the emissions source or					
sources [unit ID(s)] associated with the startup					
or shutdown) ~		
Was any permit condition exceeded and, if so,		7 4			
what permit condition was exceeded?					
Was the event covered by any contingency)				
plan for controlling emissions during startup or					
shutdown events and, if so, whether the plan					
was followed; if the plan was not followed,					
why not?					
Typical duration of an event					
Actions taken to minimize emissions during					
the event, including the use of any backup					
control systems					
Estimates or measurements, if any, of					
emissions during the event; if you did not have					
the ability to quantify emissions during the					
event, please explain why					
For affected sources ducted to afterburners, did					
any startups or shutdowns take place while the					
afterburner was not operating, or operating					
outside of the operating temperature					
established during the performance test?					
For affected sources ducted to control devices					
and monitored by continuous opacity monitors,					
did opacity exceed 10% during any startup or					
shutdown events?					

List performance test data collected during			
each period of startup or shutdown, the test			
method used for each event; when the testing			
was conducted and why; the test conditions at			
the time of testing; and whether the tests were			
associated with a routine startup or shutdown			

^{*}Startup: the commencement of operation of an affected source or portion of an affected source for any purpose; Shutdown: the cessation of operation of an affected source or portion of an affected source for any purpose

- 46. Are there any types of startup or shutdown events that you have been able to eliminate: if so, please describe the type of event and explain how these events were eliminated?
- 47. Optional: Please recommend a standard that would apply during startup and/or shutdown. Describe the type of event (e.g., defining the beginning and duration of a start-up period and similarly for a shutdown) to which the standard would apply; the recommended standard (this could be an emission limitation, work practice, or operational standard) that would apply during the period; the basis for the recommended standard; why and how the standard would minimize emissions during the event; and how compliance would be determined and/or monitored.

J. Miscellaneous Information

48. What specific improvements or rule changes would you like to see that would help your facility with compliance or better rule interpretation?

Attachment A Definitions for subpart RRR MACT sources

<u>Afterburner</u> means an air pollution control device that uses controlled flame combustion to convert combustible materials to noncombustible gases; also known as an incinerator or a thermal oxidizer.

<u>Aluminum scrap</u> means fragments of aluminum stock removed during manufacturing (i.e., machining), manufactured aluminum articles or parts rejected or discarded and useful only as material for reprocessing, and waste and discarded material made of aluminum.

<u>Aluminum scrap shredder</u> means a unit that crushes, grinds, or breaks aluminum scrap into a more uniform size prior to processing or charging to a scrap dryer/delacquering kiln/decoating kiln, or furnace. A bale breaker is not an aluminum scrap shredder.

<u>Clean charge</u> means furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/ decoated at 482 °C (900 °F) or higher, and runaround scrap

<u>Cover flux</u> means salt added to the surface of molten aluminum in a group 1 or group 2 furnace, without agitation of the molten aluminum, for the purpose of preventing oxidation.

<u>Dross-only furnace</u> means a furnace, typically of rotary barrel design, dedicated to the reclamation of aluminum from dross formed during melting, holding, fluxing, or alloying operations carried out in other process units. Dross and salt flux are the sole feedstocks to this type of furnace.

<u>Group 1 furnace</u> means a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricants, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing.

<u>Group 2 furnace</u> means a furnace of any design that melts, holds, or processes only clean charge and that performs no fluxing or performs fluxing using only nonreactive, non-HAP-containing/non-HAP-generating gases or agents.

<u>In-line fluxer</u> means a device exterior to a furnace, located in a transfer line from a furnace, used to refine (flux) molten aluminum; also known as a flux box, degassing box, or demagging box.

<u>Melting/holding furnace</u>, or melter/holder, means a group 1 furnace that processes only clean charge, performs melting, holding, and fluxing functions, and does not transfer molten aluminum to or from another furnace.

<u>Reactive fluxing</u> means the use of any gas, liquid, or solid flux (other than cover flux) that results in a HAP emission. Argon and nitrogen are not reactive and do not produce HAP.

Rotary dross cooler means a water-cooled rotary barrel device that accelerates cooling of dross.

<u>Runaround scrap</u> means scrap materials generated on-site by aluminum casting, extruding, rolling, scalping, forging, forming/stamping, cutting, and trimming operations and that do not contain paint or solid coatings. Uncoated/unpainted aluminum chips generated by turning, boring, milling, and similar machining operations may be clean charge if they have been thermally dried or treated by a centrifugal cleaner, but are not considered to be runaround scrap.

<u>Scrap dryer/delacquering kiln/decoating kiln</u> means a unit used primarily to remove various organic contaminants such as oil, paint, lacquer, ink, plastic, and/or rubber from aluminum scrap (including used beverage containers) prior to melting.

Secondary aluminum processing unit (SAPU): an existing SAPU means all existing group 1 furnaces and all existing in-line fluxers within a secondary aluminum production facility. Each existing group 1 furnace or existing in-line fluxer is considered an emission unit within a secondary aluminum processing unit. A new SAPU means any combination of group 1 furnaces and in-line fluxers which are simultaneously constructed after February 11, 1999. Each of the group 1 furnaces or in-line fluxers within a new SAPU is considered an emission unit within that secondary aluminum processing unit.

<u>Sidewell</u> means an open well adjacent to the hearth of a furnace with connecting arches between the hearth and the open well through which molten aluminum is circulated between the hearth, where heat is applied by burners, and the open well, which is used for charging scrap and solid flux or salt to the furnace, injecting fluxing agents, and skimming dross.

<u>Sweat furnace</u> means a furnace used exclusively to reclaim aluminum from scrap that contains substantial quantities of iron by using heat to separate the low-melting point aluminum from the scrap while the higher melting-point iron remains in solid form.

<u>Thermal chip dryer</u> means a device that uses heat to evaporate water, oil, or oil/water mixtures from unpainted/uncoated aluminum chips.

Attachment B

Section 112(b) List of Hazardous Air Pollutants (HAP)

U.S. Code Title 42, Chapter 85, Subchapter 1, Part A, § 7412

CAS Number	Chemical Name
75070	Acetaldehyde
60355	Acetamide
75058	Acetonitrile
98862	Acetophenone
53963	2-Acetylaminofluorene
107028	Acrolein
79061	Acrylamide
79107	Acrylic acid
107131	Acrylonitrile
107051	Allyl chloride
92671	4-Aminobiphenyl
62533	Aniline
90040	o-Anisidine
1332214	Asbestos
71432	Benzene (including benzene from gasoline)
92875	Benzidine
98077	Benzotrichloride
100447	Benzyl chloride
92524	Biphenyl
117817	Bis(2-ethylhexyl)phthalate (DEHP)
542881	Bis(chloromethyl)ether
75252	Bromoform
106990	1,3-Butadiene
156627	Calcium cyanamide
133062	Captan
63252	Carbaryl
75150	Carbon disulfide
56235	Carbon tetrachloride
463581	Carbonyl sulfide
120809	Catechol
133904	Chloramben Chlordane
57749 7782505	Chlorine
79118	Chloroacetic acid
532274	2-Chloroacetophenone
108907	Chlorobenzene
510156	Chlorobenzilate
67663	Chloroform
107302	Chloromethyl methyl ether
126998	Chloroprene
1319773	Cresols/Cresylic acid (isomers and mixture)
95487	o-Cresol
55.57	0 0.0001

108394 m-Cresol 106445 p-Cresol 98828 Cumene 2,4-D, salts and esters 94757 3547044 DDE 334883 Diazomethane 132649 Dibenzofurans 1,2-Dibromo-3-chloropropane 96128 84742 Dibutylphthalate 106467 1,4-Dichlorobenzene(p) 91941 3,3-Dichlorobenzidene Dichloroethyl ether (Bis(2-chloroethyl)ether) 111444 542756 1,3-Dichloropropene **Dichlorvos** 62737 111422 Diethanolamine N,N-Diethyl aniline (N,N-Dimethylaniline) 121697 64675 Diethyl sulfate 119904 3,3-Dimethoxybenzidine 60117 Dimethyl aminoazobenzene 3,3-Dimethyl benzidine 119937 79447 Dimethyl carbamoyl chloride Dimethyl formamide 68122 57147 1,1-Dimethyl hydrazine 131113 Dimethyl phthalate Dimethyl sulfate 77781 534521 4,6-Dinitro-o-cresol, and salts 2,4-Dinitrophenol 51285 121142 2,4-Dinitrotoluene 123911 1,4-Dioxane (1,4-Diethyleneoxide) 122667 1,2-Diphenylhydrazine 106898 Epichlorohydrin (I-Chloro-2,3-epoxypropane) 106887 1,2-Epoxybutane 140885 Ethyl acrylate Ethyl benzene 100414 Ethyl carbamate (Urethane) 51796 75003 Ethyl chloride (Chloroethane) 106934 Ethylene dibromide (Dibromoethane) 107062 Ethylene dichloride (1,2-Dichloroethane) 107211 Ethylene glycol 151564 Ethylene imine (Aziridine) Ethylene oxide 75218 96457 Ethylene thiourea Ethylidene dichloride (1,1-Dichloroethane) 75343 50000 Formaldehyde Heptachlor 76448 118741 Hexachlorobenzene 87683 Hexachlorobutadiene 77474 Hexachlorocyclopentadiene Hexachloroethane

67721

822060 680319 110543 302012 7647010 7664393 123319 78591 58899 108316 67561 72435 74839 74873 71556 60344 74884 108101 624839 80626	Hexamethylene-1,6-diisocyanate Hexamethylphosphoramide Hexane Hydrazine Hydrochloric acid Hydrogen fluoride (Hydrofluoric acid) Hydroquinone Isophorone Lindane (all isomers) Maleic anhydride Methanol Methoxychlor Methyl bromide (Bromomethane) Methyl chloride (Chloromethane) Methyl chloroform (1,1,1-Trichloroethane) Methyl iodide (Iodomethane) Methyl isobutyl ketone (Hexone) Methyl isocyanate Methyl methacrylate
1634044	Methyl tert butyl ether
101144	4,4-Methylene bis(2-chloroaniline)
75092	Methylene chloride (Dichloromethane)
101688 101779	Methylene diphenyl diisocyanate (MDI) 4,4-Methylenedianiline
91203	Naphthalene
98953	Nitrobenzene
92933	4-Nitrobenzene
100027	4-Nitrophenol
79469	2-Nitroprienor
684935	N-Nitroso-N-methylurea
62759	N-Nitrosodimethylamine
59892	N-Nitrosomorpholine
56382	Parathion
82688	Pentachloronitrobenzene (Quintobenzene)
87865	Pentachlorophenol
108952	Phenol
106503	p-Phenylenediamine
75445	Phosgene
7803512	Phosphine
7723140	Phosphorus
85449	Phthalic anhydride
1336363	Polychlorinated biphenyls (Aroclors)
1120714	1,3-Propane sultone
57578	beta-Propiolactone
123386	Propionaldehyde
114261	Propoxur (Baygon)
78875	Propylene dichloride (1,2-Dichloropropane)
75569	Propylene oxide

75558	1,2-Propylenimine (2-Methyl aziridine)
91225	Quinoline
106514	Quinone
100425	Styrene
96093	Styrene oxide
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin
79345	1,1,2,2-Tetrachloroethane
127184	Tetrachloroethylene (Perchloroethylene)
7550450	Titanium tetrachloride
108883	Toluene
95807	2,4-Toluene diamine
584849	2,4-Toluene diisocyanate
95534	o-Toluidine
8001352	Toxaphene (chlorinated camphene)
120821	1,2,4-Trichlorobenzene
79005	1,1,2-Trichloroethane
79016	Trichloroethylene
95954	2,4,5-Trichlorophenol
88062	2,4,6-Trichlorophenol
	·
121448	Triethylamine
1582098	Trifluralin
540841	2,2,4-Trimethylpentane
108054	Vinyl acetate
593602	Vinyl bromide
75014	Vinyl chloride
75354	Vinylidene chloride (1,1-Dichloroethylene)
1330207	Xylenes (isomers and mixture)
95476	o-Xylenes
108383	m-Xylenes
106423	p-Xylenes
0	Antimony Compounds
0	
	Arsenic Compounds (inorganic including arsine)
0	Beryllium Compounds
0	Cadmium Compounds
0	Chromium Compounds
0	Cobalt Compounds
0	Coke Oven Emissions
0	Cyanide Compounds ¹
0	Certain Glycol ethers ²
0	Lead Compounds
0	Manganese Compounds
0	Mercury Compounds
0	Fine mineral fibers ³
-	
0	Nickel Compounds
0	Polycyclic Organic Matter ⁴
0	Radionuclides (including radon) ⁵
0	Selenium Compounds
MOTE, Famall Bakksan	s above which contain the word "compounds" and fo

NOTE: For all listings above which contain the word "compounds" and for glycol ethers, the following applies: Unless otherwise specified, these listings are defined as including any

unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical's infrastructure.

- 1 XCN where X = H or any other group where a formal dissociation may occur. For example KCN or Ca(CN) $_{2}$.
- 2 Includes mono- and di- ethers of ethylene glycol (except for ethylene glycol monobutyl ether (CAS Number 111–76–2), diethylene glycol, and triethylene glycol R-(OCH $_2$ CH $_2$)n-OR where

n = 1, 2, or 3

R = alkyl or aryl groups

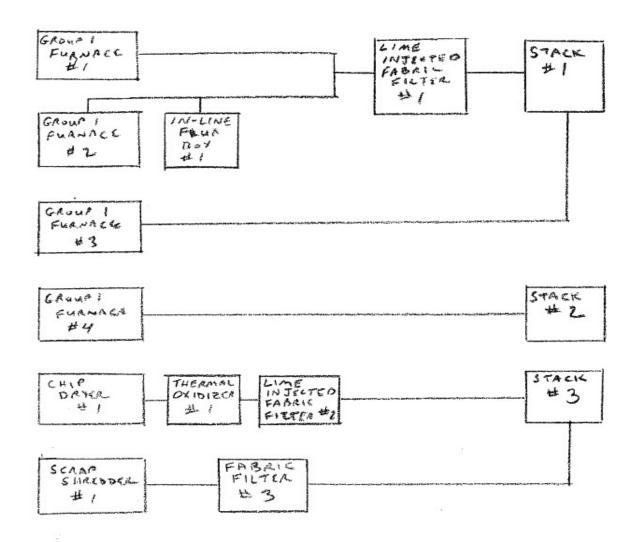
R = R, H, or groups which, when removed, yield glycol ethers with the structure: R = R (OCH₂CH)n-OH. Polymers are excluded from the glycol category.

- ³ Includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less.
- ⁴ Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.
- ⁵ A type of atom which spontaneously undergoes radioactive decay.

Attachment C

Process Flow Diagram Example





SAMPLE