COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Kaiser Aluminum Fabricated Products LLC
1901 Reymet Road, Richmond, Virginia
Permit No. PRO50249

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Kaiser Aluminum Fabricated Products LLC has applied for a Title V Operating Permit for its Bellwood VA facility located in Richmond, VA. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:
Sherry L. Tostenson
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Air Permit Manager:_____ Date:
James E. Kyle, P.E.

Deputy Regional Director:_____ Date:
Kyle Ivar Winter, P.E.

FACILITY INFORMATION

Permittee
Kaiser Aluminum Fabricated Products LLC
1901 Reymet Road
Richmond, VA 23237

Facility
Kaiser Aluminum Fabricated Products LLC – Bellwood, VA Plant
1901 Reymet Road
Richmond, VA 23237

County-Plant Identification Number: 51-041-0003

SOURCE DESCRIPTION

NAICS Code: 331316 – Aluminum Extruded Product Manufacturing (Aluminum bar made by extruding purchased aluminum)

Purchased aluminum alloy logs and/or billets from others are sent directly to one of the three billet saws to be sawed into shorter billets as necessary. Sawed billets and purchased billets enter one of five aluminum billet heaters (furnaces) three of which, unit nos. U31, U33 and U34 are significant emission units fired by natural gas. Next, the heated billets are extruded to form the desired product. Dies used in the extrusion process are periodically cleaned at the Caustic Cleaning Station (unit no. U40). Particulate emissions, which occur during the cleaning of the dies are controlled by a wet scrubber (unit no. CD40).

After the extruded product is cooled with a water spray, solvent from the Solvent Degreaser and Solvent Production Parts Washer (unit no. U50) is used to clean any remaining lubricants from approximately 25% of the extruded products.

The facility is a Title V major source of Volatile Organic Compounds (VOCs). This source is located in an attainment area for all pollutants and a VOC/NO_X control area for VOCs/NO_x, The source is not a PSD source. The facility is currently permitted under a minor NSR permit issued on October 26, 1995.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit on April 6, 2011, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Aluminum Billet Heaters No. 2, No. 7 and No. 3							
U31	S31	Granco Clark Model 914-35-4-S aluminum billet heater no. 2 (fuel: natural gas)	13 MMBtu/hr 10,000 lbs/hr (aluminum process)	-	-	-	-
U33	S33	Granco Clark Model 1418-65-6 Hotjet aluminum billet heater no. 7 (fuel: natural gas)	12.6 MMBtu/hr 20,000 lbs/hr (aluminum process)	-	-	-	-
U34	S34	Granco Clark Model 914-35-4-S aluminum billet heater no. 3 (fuel: natural gas)	13 MMBtu/hr 10,000 lbs/hr (aluminum process)	-	-	-	-
Caustic Cleaning Station for extrusion dies							
U40	S40	Caustic die cleaning station (one 1,683 gal. and one 570 gal. tanks used for tool steel extrusion dies cleaning)	17,000 lbs/hr	Heil Fume Scrubber Series 734	CD40	PM	10/26/95

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Solvent Degreaser, Solvent Production Parts Washer and Safety-Kleen Maintenance Parts Washer							
U50	-	Solvent degreaser System (11,000 gal. dip tank with 7,000 gal. operating volume and solvent production parts washer for aluminum extrusions)	10,000 lbs/hr	-	-	-	_
125	-	Safety-Kleen maintenance parts washer	80 gallons	-	-	-	-
Gasoline Aboveground Storage Tank							
I08	-	Gasoline Aboveground Storage Tank (supplies vacuum unit)	500 gallons	-	-	-	-

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

The 2011 annual emissions (as reported in Virginia's Comprehensive Environmental Data System (CEDS)) are summarized in the following tables.

2011 Actual Emissions

2011 Facility Wide Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO_2	PM_{10}	NO_x
126.7	1.4	0.09	0.1	1.8

2011 Facility Hazardous Air Pollutant Emissions

Pollutant	2011 Hazardous Air Pollutant Emission in Tons/Yr
Hexane	0.001

EMISSION UNIT APPLICABLE REQUIREMENTS – emission unit ID#s U31, U33, and U34
There are no applicable requirements for these units. They were listed in the significant unit list because the units are not one of the listed insignificant emissions activities and the emissions from them are greater than the insignificant emissions activity levels.

EMISSION UNIT APPLICABLE REQUIREMENTS – emission unit ID# U40

Limitations

The following limitations are State BACT requirements (of requiring a certain type of control and the resulting emission limitations based on this required control) from conditions 3 and 7 of the minor NSR permit issued on October 26, 1995.

Condition 1. of the Title V permit (as follows) addresses condition 3 of the October 26, 1995 minor NSR permit.:

1. Particulate emissions from the caustic cleaning station shall be controlled by a 99% efficient scrubber (Heil Fume Scrubber Series 734). The scrubber shall be provided with adequate access for inspection. The scrubber shall be equipped with a water flow meter. The flow meter shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.

Condition 2. of the Title V permit (as follows) addresses condition 7 of the October 26, 1995 minor NSR permit.:

2. Emissions from the operation of the caustic cleaning station shall not exceed the limits specified below:

Total Suspended Particulate	0.5 lbs/hr	1.7 tons/yr
PM-10	0.5 lbs/hr	1.7 tons/yr

The following limitation is the Visible Emission Standards for New and Modified Sources of 20% opacity except for one 6-minute period in any one hour of not more than 30% opacity from condition 8 of the minor NSR permit issued on October 26, 1995.

Condition 3. of the Title V permit (as follows) addresses condition 8 of the October 26, 1995 minor NSR permit.:

8. Visible emissions from the scrubber serving the two caustic cleaning tanks shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except for one 6-minute period in any one hour of not more than 30% opacity.

Monitoring and Recordkeeping

Monitoring and recordkeeping requirements were added previously to meet Part 70 requirements as per Title V conditions 4, 5, and 6 as there was not sufficient monitoring/recordkeeping in the supporting NSR permit. The additional monitoring and recordkeeping addressed obtaining readings of the water flow meter on the caustic cleaning station scrubber. The readings are used to determine if the scrubber and flow meter are operating properly and if not to return them to proper operation. Similarly, visible emissions observations (VEOs)/visible emission evaluations (VEEs) are used to determine if the scrubber and caustic cleaning station is operating properly along with ensuring the associated emission limits are not exceeded. The associated records used for monitoring are summarized in condition 6 which includes keeping records of emission factors used to calculate emissions for emission limitations.

Testing

Condition 7. of the Title V permit addresses condition 5 of the October 26, 1995 minor NSR permit which requires construction so that the appropriate EPA emissions testing can be performed at any time to determine the emissions being emitted.

Reporting

Reporting requirements (Title V conditions 8 and 9) were added previously to report any occurrences that required corrective actions determined during the associated monitoring/recordkeeping.

EMISSION UNIT APPLICABLE REQUIREMENTS – emission unit ID# U50 and 125

The following Virginia Administrative Codes (VAC) that have specific emission requirements have been determined to be applicable to emission unit ID# U50 and 125:

Article 24: Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents (Rule 4-24)

9 VAC 5-40-3280 ***Standard for volatile organic compounds***

C. Cold Cleaning 1 & 2:

Condition 10. of the Title V permit (as follows) addresses the VOC standard for 9 VAC 5-40-3280 C1 & C2:

10. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Limitations -** No owner or other person shall use or permit the use of any cold cleaner unless such cleaner is equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 85% by weight of volatile organic compound emissions. Achievement of this emission standard by use of the methods in conditions 11, 12, and 13 will be acceptable to the board.

9 VAC 5-40-3290 Control Technology Guidelines

C. Cold Cleaning

1. ***Control Requirements***

Condition 11. of the Title V permit (as follows) addresses the VOC control requirements for 9 VAC 5-40-3290 C1:

11. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Limitations** – VOC emission unit ID #s U50 and 125 shall be controlled as follows:

a. Covers or enclosed remote reservoirs should be provided. Covers shall be designed so that they can be easily operated with one hand. (Covers for larger degreasers may require mechanical assistance, by spring loading, counterweighting or powered systems). Enclosed remote reservoirs shall be designed such that they provide reduction effectiveness equivalent to that of a cover.

b. External or internal drainage facilities shall be provided to collect and return the solvent to a closed container or a solvent cleaning machine. The drainage facilities may be external for applications where an internal type cannot fit into the cleaning system.

c. A permanent label summarizing the operating procedures in condition 12 shall be placed in a conspicuous location on or near emission unit ID#s U50 and 125.
(9 VAC 5-80-110 and 9 VAC 5-40-3290 C1)

9 VAC 5-40-3290 Control Technology Guidelines

C. Cold Cleaning

2. ***Operating Requirements***

Condition 12. of the Title V permit (as follows) addresses the VOC control technology guidelines by the use of operating requirements for 9 VAC 5-40-3290 C2:

12. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Limitations** – The permittee shall operate emission unit ID#s U50 and 125 consistent with good operating practices including the following:

a. Waste solvent shall not be disposed of or transferred to another party, such that greater than 20% of the waste (by weight) can evaporate into the atmosphere. Waste solvent shall only be stored in closed containers.

b. The degreaser cover shall be closed whenever not handling parts in the cleaner.

c. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases.

(9 VAC 5-80-110 and 9 VAC 5-40-3290 C2)

9 VAC 5-40-3290 Control Technology Guidelines

D. ***Disposal*** of waste solvent from solvent metal cleaning operations:

Condition 13. of the Title V permit (as follows) addresses the VOC control technology guidelines by the use of various proper methods of *disposal* which reduces the amount of VOCs emitted during disposal requirements for 9 VAC 5-40-3290 D 1. & 2.:

13. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Limitations** – The permittee shall dispose the waste solvent from solvent metal cleaning operations by one of the following methods:
a. Reclamation (either services or in-house)
b. Incineration
(9 VAC 5-80-110 and 9 VAC 5-40-3290 D)

9 VAC 5-40-3360 ***Monitoring***.

The provisions of 9 VAC 5-40-40 (Monitoring) apply.

Condition 14. of the Title V permit (as follows) addresses the provisions of *monitoring* of the applicable requirements for Rule 4-24:

14. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Monitoring** – The permittee shall conduct an inspection of emission unit ID#s U50 and 125 and a review of emission unit ID#s U50 and 125 operating practices to ensure that all applicable provisions of conditions 11 – 13 are being met. On any occasion that an applicable provision is not being met, the permittee shall conduct appropriate corrective action to return emission unit ID#s U50 and 125 to proper operations as expeditiously as possible.
(9 VAC 5-80-110)

9 VAC 5-40-3370 Notification, ***records*** and ***reporting***.

The provisions of 9 VAC 5-40-50 (Notification, Records and Reporting) apply.

15. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Recordkeeping** – The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:

    a. The results of the weekly inspections and reviews of emission unit ID#s U50 and 125 and their operating practices required by condition 14 and details of any corrective action taken as a result of these inspections.

    These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
    (9 VAC 5-80-110)

16. **Process Equipment Requirements – (emission unit ID#s U50 and 125) – Reporting** – The permittee shall report the results of any inspection or review, required by condition 14 that demonstrates that a requirement of conditions 11 – 13 is not being met. The source shall also report the length of time associated with any exceedance of such a standard and the actions taken to correct the exceedance.
(9 VAC 5-80-110)

Gasoline Storage Tank (supplies mobile vacuum unit) – emission unit ID# I08 – Generally Available Control Technology (GACT) CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities:

Conditions 17 and 18. of the Title V permit addresses the "General Duties to minimize emissions" and "Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline". (The monthly throughput for this tank is significantly less than 10,000 gallons based on 2011 of only 400 gallons was used.) These two conditions are essentially verbatim from 40 CFR 63 Subpart CCCCCC. The requirements are primarily work practice standards and recordkeeping.

Streamlined Requirements

The following conditions in the October 26, 1995 permit have not been included in the Title V permit along with the rationale:

- Inspection and entry condition – the same requirements are included in the Title V general conditions which are as stringent along with it being redundant. The requirements have been overtaken in the Title V (Part 70) regulations.
- Malfunction reporting condition – the same requirements are part of the Title V general conditions. As indicated prior, it would be redundant.
- Suspension or revocation of an NSR permit condition -
- Transfer of ownership condition relative to the Title V permit – the transfer requirements are included in the Title V general conditions which make it redundant.

In general certain conditions within existing NSR permits may be applicable to all newly constructed or modified equipment that receive a permit such as the condition for maintenance/operating procedures.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-50. Notification, Records and Reporting
9 VAC 5-50-50. Notification, Records and Reporting

Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in general condition “Malfunction as an Affirmative Defense” and general condition “Failure/Malfunction Reporting”. For further explanation see the comments on general condition “Failure/Malfunction Reporting”.

This general condition cites the sections that follow:
9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9 VAC 5-60-70. Designated Emissions Standards
9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State such as the following (however, they were not identified as applicable by the applicant):

9 VAC 5-50-310, Odorous Emissions
9 VAC 5-50-320, Toxic Pollutants

FUTURE APPLICABLE REQUIREMENTS

No future applicable requirements have been identified for this facility.

INAPPLICABLE REQUIREMENTS

No inapplicable requirements were identified by the applicant. However, the following requirements were evaluated to ensure they were not possibly applicable along with the reasons why they were determined not to be applicable:

The following Virginia Administrative Codes (VAC) that have specific emission requirements has been determined to be inapplicable:

Existing Rules:

Article 8: Emission Standards for Fuel Burning Equipment (Rule 4-8)

The natural gas aluminum billet heaters do not meet the applicability as they do not meet the definition of "fuel burning equipment". They are not for the primary purpose of producing heat for indirect heat transfer or for indirect production of power.

Article 17: Emission Standards for Woodworking Operations (Rule 4-17)

Even though there are wood shop saws present this particular rule is not subject to these saws as they are not part of a process which performs woodworking such as for an example a wood furniture industry.

Article 18: Emission Standards for Primary and Secondary Metal Operations (Rule 4-18)

The aluminum extrusion process does not meet the definition of "aluminum production operation" as there is no production of aluminum or aluminum alloys or the process of smelting or melting therefore this facility is not subject to Article 18.

Article 37: Emission Standards for Petroleum Liquid Storage and Transfer Operations (Rule 4-37)

The 500 gallon gasoline aboveground storage tank is not subject to this rule as the tank is below 40,000 gallons and is not considered a gasoline dispensing facility under this rule and therefore is not required to have a Stage I vapor control system. Also, the petroleum storage tanks listed in the insignificant emissions units list store kerosene, diesel and no. 2 fuel oil which does not meet the applicability due to their vapor pressure.

The following Federal Regulations that have specific emission requirements have been determined to be inapplicable:

Maximum Available Control Technology (MACT):

40 CFR 63 Subpart T: National Emission Standards for Halogenated Solvent Cleaning

The MACT standard for halogenated solvent cleaning in 40 CFR Part 63 Subpart T is not currently applicable. It is understood the facility does not use any halogenated cleaning solvents in its parts washers.

40 CFR 63 Subpart RRR: National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production

The facility has permanently shutdown the secondary aluminum melting process per Letter of Mutual Determination dated August 26, 2010*. Therefore the three remelt furnaces and the three homogenization furnaces are permanently shutdown and exempts them from MACT Subpart RRR.

**: Previously addressed in the prior Title V minor modification dated May 20, 2011.*

40 CFR 63 Subpart DDDD: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

There were no listed units in the Title V application for this area source which met the definition of a boiler and the definition of an industrial boiler under this MACT. Therefore, MACT JJJJJJ does not apply to this facility.

NSPS
40 CFR 60 Subpart Ka: Standards of Performance for Storage Vessels for Petroleum Liquids Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 or 40 CFR 60 Subpart Kb: Standards of Performance for Storage Vessels for Petroleum Liquids Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
None of the possibly applicable storage tanks listed under the insignificant emissions activities list meet the applicability of storage capacity or type of liquid stored for either of these two NSPSs. These were evaluated as the commencement dates for these tanks would be for one of these time frames.

Greenhouse Gases (GHGs)
In addition, there are no applicable greenhouse gases (GHGs) permitting requirements.

The following October 26, 1995 NSR permit conditions are considered inapplicable as they are obsolete for the following reasons:

Condition no. 4 – the existing caustic cleaning tanks have been replaced with one 570 gallon and one 1,683 gallon caustic cleaning tanks.

Condition no. 6 – the required visible emission evaluation (VEE) has already been performed.

Condition no. 9 – the notifications have already been performed for notifying when the actual modification occurred, startup and anticipated date of performance test.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
I01	Locker room heater (physically disconnectd 9/30/11, replaced by electric heating systems for both space heat and hot water heat)	9 VAC 5-80-720 C		0.837 MMBtu/hr
I02	Oil/water separators	9 VAC 5-80-720 B	VOC	
I03	Oil/water separator dump station	9 VAC 5-80-720 B	VOC	
I04	(2) 20,000 gal (each) underground solvent storage tanks	9 VAC 5-80-720 B	VOC	
I05	(1) 560 gal (each) underground solvent storage tanks	9 VAC 5-80-720 B	VOC	
106	(1) 3,000 gal. no. 2 fuel oil storage tank (used to supply unit ref. no. 101 – plan to remove/dispose remaining fuel supply)	9 VAC 5-80-720 B	VOC	

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
107	(1) 1,100 gal. kerosene aboveground storage tank (supplies mobile vacuum unit)	9 VAC 5-80-720 B	VOC	
I09	(2) 10,000 gal. (each) hydraulic fluid aboveground storage tanks and (2) 6,000 gal. spent fluid for recycle underground storage tanks	9 VAC 5-80-720 B	VOC	
I10	(3) < 150 gal. (each) sodium hydroxide etch/nitric demut/rinse line tanks	9 VAC 5-80-720 B	PM	
111	(1) 9,000 gal. nitrogen generation unit/cryogenic storage tank	9 VAC 5-80-720 B	No regulated pollutants	
112	1 3,000 gal oxygen generation unit/cryogenic storage tank	9 VAC 5-80-720 B	No regulated pollutants	
113	(3) video ink jet stations	9 VAC 5-80-720 B	VOC	

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
114	Billet, press finish and pack/ship aluminum saws	9 VAC 5-80-720 B	PM	
115	Wood shop saws	9 VAC 5-80-720 B	PM	
116	Billet, die and dummy block lubrication application at extrusion presses	9 VAC 5-80-720 B	PM and VOC	
117	Natural gas installed space heaters (all are no longer in operation, except 3 over aluminum saw area)	9 VAC 5-80-720 C		0.50 MMBtu/hr (each)
118	Installed natural gas door heaters (all no longer in operation)	9 VAC 5-80-720 C		0.85 MMBtu/hr (each)
119	(5) Natural gas age/anneal ovens	9 VAC 5-80-720 C		3.5-6.0 MMBtu/hr (each)
120	Natural gas solvent still boiler unit	9 VAC 5-80-720 C		2.5 MMBtu/hr
121	Die cleaning sodium hydroxide tanks heating unit (open flame nozzles)	9 VAC 5-80-720 C		1.692 MMBtu/hr (total)

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
122	No. 1 press line billet heater (natural gas) (inoperable as is press no. 1 this equipment is basically scrap)	9 VAC 5-80-720 C		<10 MMBtu/hr
123	No. 6 press line billet heater (natural gas)	9 VAC 5-80-720 C		9.0 MMBtu/hr
124	Driveshaft Finishing Process that removes any residual draw lube from products using wipes with cleaning solvent	9 VAC 5-80-720 B	VOC and HAP	

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Style Weekly from August 22 2012 to September 21, 2012.

No comments were received during the thirty day public comment period. An e-mail was sent on September 24, 2012 to Cathleen Kennedy Van Osten of EPA Region III asking whether any comments would be made by EPA for this Title V permit renewal. It was also indicated in this same e-mail if not the permit would be finalized for signature on September 25, 2012 or September 26, 2012. Cathleen Kennedy Van Osten responded in a September 25, 2012 e-mail EPA would not be commenting on the Kaiser Aluminum Fabricated Products LLC permit.