



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

4949A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

September 25, 2012

Mr. Joe Brewster
Plant Manager
Kaiser Aluminum Fabricated Products LLC – Bellwood, VA Plant
1901 Reymet Road
Richmond, VA 23237

Location: County of Chesterfield
Registration No.: 50249

Dear Mr. Brewster:

Attached is a renewal Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Kaiser Aluminum Fabricated Products LLC – Bellwood, VA Plant of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,

Kyle Ivar Winter
Deputy Regional Director

KIW/SLT/50249_007_12.doc

Attachments: Permit

Links: GACT CCCCCC: <http://ecfr.gpoaccess.gov/>
(Directions: select Title 40, click on 63.8980-End and select Subpart CCCCCC)

ec: Susan Tripp, Administrative Data Coordinator, OAPP
Kotur Narasimhan, Point Source Inventory Specialist, Air Data Analysis
Cathleen Kennedy Van Osten, U.S. EPA, Region III
Megan Hayes, Inspector, Air Compliance



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Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Kaiser Aluminum Fabricated Products LLC
Facility Name:	Kaiser Aluminum Fabricated Products LLC – Bellwood, VA Plant
Facility Location:	1901 Reymet Road Richmond, Virginia
Registration Number:	50249
Permit Number:	PRO50249

This permit includes the following program:

Federally Enforceable Requirements - Clean Air Act (Pages 3–26)

September 26, 2012

Effective Date

September 25, 2017

Expiration Date

Deputy Regional Director

September 25, 2012

Signature Date

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NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
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Facility Information

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

Responsible Official
Joe Brewster
Plant Manager

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

Contact Person
Teno Bratton
Environmental, Health & Safety Manger
(804) 743-6475

County-Plant Identification Number: 51-041-0003

Facility Description: NAICS 331316 – The facility is an aluminum extruded product manufacturing facility which is operated by Kaiser Aluminum Fabricated Products LLC.

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.

Emission Units

Equipment to be operated consists of:

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.

Caustic Cleaning Station (for Extrusion Dies) Requirements – (emission unit ID# U40)

- 1. Process Equipment Requirements – (emission unit ID# U40) - Limitations -**
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.

(9 VAC 5-80-110 and Condition 3 of 10/26/95 Permit)

- 2. Process Equipment Requirements – (emission unit ID# U40) - Limitations -**
Emissions from the operation of the caustic cleaning station shall not exceed the limits specified below:

Total	0.5 lbs/hr	1.7 tons/yr
Suspended Particulate		

PM-10	0.5 lbs/hr	1.7 tons/yr
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(9 VAC 5-80-110 and Condition 7 of 10/26/95 Permit)

- 3. Process Equipment Requirements – (emission unit ID#U40) - Limitations -**
Visible emissions from the scrubber serving the caustic cleaning station shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except for one six-minute period in any one hour of not more than 30% opacity.

(9 VAC 5-80-110 and condition 8 of the 10/26/95 NSR permit)

- 4. Process Equipment Requirements – (emission unit ID# U40) –
Monitoring/Recordkeeping** – The permittee shall conduct the following monitoring:

Once each operating day, the permittee shall obtain and record a reading from the water flow meter on the scrubber serving the caustic cleaning station. On any occasion that the scrubber or water flow meter is found to be inoperable or in a malfunctioning state, or the reading of the water flow meter indicates a water flow rate of less than 75 gallons per minute, the permittee shall conduct appropriate corrective action to return the scrubber and/or water flow meter to proper operation as expeditiously as possible.

(9 VAC 5-80-110)

5. **Process Equipment Requirements – (emission unit ID# U40) – Monitoring/Recordkeeping** – The scrubber serving the caustic cleaning station shall be observed visually at least once each operating week for at least a brief time period to determine if the unit has any visible emissions (does not include condensed water vapor/steam), unless an EPA Method 9 (reference 40 CFR 60, Appendix A) visible emissions evaluation is performed on the scrubber. If the scrubber is observed having any visible emissions, the initial observation shall be followed up with an EPA Method 9 (reference 40 CFR 60 Appendix A) visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-80-110)

6. **Process Equipment Requirements – (emission unit ID# U40) – Monitoring/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 scrubber water flow rate records required by condition 4 and details of any corrective action taken as a result of these records.
- b. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in condition 2.
- c. The results of the weekly visible emission inspections of the caustic cleaning station scrubber required by condition 5 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 5-50-50 and 9 VAC 5-80-110)

7. **Process Equipment Requirements – (emission unit ID# U40) - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9 VAC 5-50-30, 9 VAC 5-80-110 and condition 5 of the October 26, 1995 permit)

8. **Process Equipment Requirements – (emission unit ID#U40) - Reporting** – The permittee shall report the results of any scrubber water flow meter reading required by condition 4, that demonstrates that the scrubber water flow rate was less than 75 gallons per minute. The permittee shall also report the length of time the scrubber was operated at such a reduced water flow and the corrective actions taken to return the scrubber to normal operating conditions. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110)

9. **Process Equipment Requirements – (emission unit ID# U40) – Reporting** – The permittee shall report the results of any EPA Method 9 (reference 40 CFR Part 60, Appendix A) opacity test performed as a result of condition 5. If the test indicates the facility is out of compliance with the standard contained in condition 3, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110)

Solvent Degreaser and Solvent Production Parts Washer (for Aluminum Extrusions) Requirements – (emission unit ID# U50) and Safety Kleen Maintenance Parts Washer Requirements - (emission unit ID# 125)

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 5-80-110 and 9 VAC 5-40-3280 C)

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

- a. Covers or enclosed remote reservoirs shall 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)

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)

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)

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 operation as expeditiously as possible.

(9 VAC 5-80-110)

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. This report shall be sent to the Director, Piedmont Regional Office.

(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**

17. Process Equipment Requirements – (emission unit ID# I08) – General duties to minimize emissions – Each owner or operator of an affected source under 40 CFR 63 Subpart CCCCCC must comply with the requirements of 40 CFR 63.11115 (a) and (b) as follows:

- (a) You must at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Virginia Department of Environmental Quality - Piedmont Regional Office which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- (b) You must keep applicable records and submit reports as specified in 40 CFR 63.11125(d) and 40 CFR 63.11126(b).

(9 VAC 5-80-110 and 40 CFR 63.11115)

18. Process Equipment Requirements – (emission unit ID# I08) – Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline –

- (a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - (1) Minimize gasoline spills;
 - (2) Clean up spills as expeditiously as practicable;
 - (3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use.
 - (4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
 - (b) You are not required to submit notifications or reports as specified in 40 CFR 63.11125, 40 CFR 63.11126, or subpart A of 40 CFR 63, but you must have records available within 24 hours of a request by VA Department of Environmental Quality (VADEQ) – Piedmont Regional Office (PRO) to document your gasoline throughput.
 - (c) You must comply with the requirements of 40 CFR 63 by the applicable dates specified in 40 CFR 63.11113.
 - (d) Portable gasoline containers that meet the requirements of 40 CFR 59 subpart F, are considered acceptable for compliance with 40 CFR 63.11116(a)(3).
- (9 VAC 5-80-110 and 40 CFR 63.11116)

Facility Wide Conditions

- 19. Facility Wide Conditions - Limitations** – Unless specified otherwise in this part, on or after the date on which the performance test required to be conducted by 9 VAC 5-50-30 is completed, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to the following emission units: U31, U33 and U34. Compliance shall be determined by 9 VAC 5-50-20.
- (9 VAC 5-80-110 and 9 VAC 5-50-80)

20. **Facility Wide Conditions – Monitoring and Recordkeeping** – In order to minimize the duration and frequency of excess emissions, including visible emissions, due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
- b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-80-110 and Condition 13 of 10/26/95 Permit)

21. **Facility Wide Conditions – Monitoring and Recordkeeping** – The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training.

(9 VAC 5-80-110 and Condition 14 of 10/26/95 Permit)

22. **Facility Wide Conditions – Monitoring and Recordkeeping** – Each emissions unit with a visible emissions requirement in condition 19 shall be observed visually at least once each calendar week for at least a brief time period to determine which operating emissions units have normal visible emissions (does not include condensed water vapor/steam), unless an EPA Method 9 (40 CFR 60 Appendix A) visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above-normal visible emissions shall be followed up with an EPA Method 9 (reference 40 CFR 60 Appendix A) visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-80-110)

23. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9 VAC 5-40-30 or 9 VAC 5-50-30, 9 VAC 5-80-110 and condition 5 of 10/26/95 Permit)

24. **Facility Wide Conditions - Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.

(9 VAC 5-80-110)

25. Facility Wide Conditions - Reporting – The permittee shall report the results of any EPA Method 9 (reference 40 CFR Part 60 Appendix A) opacity test performed as a result of condition 22. If the test indicates the facility is out of compliance with the standard contained in condition 19, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110)

Insignificant Emission Units

26. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I01	Locker room heater (physically disconnected 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	

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
I05	(1) 560 gal. above ground diesel fuel storage tank (supplies diesel powered forklifts)	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	
107	(1) 1,100 gal. kerosene aboveground storage tank (supplies portable kerosene space heaters)	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	

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
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	
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)

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
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)
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 B	NO _x , SO ₂ , PM, CO, and VOC	<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	

These emission units are presumed to be in compliance with all requirements of the federal 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.

Permit Shield & Inapplicable Requirements

27. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the

following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
NA		No inapplicable requirements were identified in the Title V permit application.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

General Conditions

28. **General Conditions - Federal Enforceability** -All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)
29. **General Conditions - Permit Expiration**- This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
30. **General Conditions - Permit Expiration**-The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)
31. **General Conditions - Permit Expiration**-If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

32. **General Conditions - Permit Expiration**-No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

33. **General Conditions - Permit Expiration**-If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

34. **General Conditions - Permit Expiration**-The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

35. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements.
- b. The date(s) analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses.
- f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

36. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five 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 the permit.

(9 VAC 5-80-110 F)

37. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

38. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the

certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- b. The identification of each term or condition of the permit that is the basis of the certification.
- c. The compliance status.
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- f. Such other facts as the permit may require to determine the compliance status of the source.
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3-APD-Permits@epa.gov

(9 VAC 5-80-110 K.5)

39. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 37 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

40. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within

14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office.

(9 VAC 5-20-180 C)

41. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

42. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

43. **General Conditions - Need to Halt or Reduce Activity not a Defense** -It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

44. **General Conditions - Permit Modification** -A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

45. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

46. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)
47. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)
48. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)
49. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;

- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

50. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

51. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

52. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

- d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

53. General Conditions - Reopening For Cause - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

54. General Conditions - Permit Availability - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

55. General Conditions - Transfer of Permits - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

56. General Conditions - Transfer of Permits - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

57. General Conditions - Transfer of Permits - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

58. General Conditions - Malfunction as an Affirmative Defense - A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of condition 60 of this condition are met.

(9 VAC 5-80-250)

59. General Conditions - Malfunction as an Affirmative Defense - The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
- b. The permitted facility was at the time being properly operated.
- c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

(9 VAC 5-80-250)

60. General Conditions - Malfunction as an Affirmative Defense - In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

(9 VAC 5-80-250)

61. **General Conditions - Malfunction as an Affirmative Defense** - The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.
(9 VAC 5-80-250)
62. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)
63. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)
64. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)
65. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
 - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
- (9 VAC 5-80-110 I)