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SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY

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IN THE MATTER OF
KAISER ALUMINUM & CHEMICAL CORPORATION, TRENTWOOD WORKS
SPOKANE, WASHINGTON

ORDER NO. 91-01
ALTERNATE OPACITY LIMIT

I. INTRODUCTION

A. Pursuant to RCW 70.94.331(2)(c) an industry or the air pollution control authority having jurisdiction may choose, subject to submitting appropriate data that the industry has quantified, to have any limit on the opacity of emissions from a source whose emission standard is stated in terms of a weight of particulate per unit volume of air (e.g., grains per dry standard cubic foot) be based on the applicable particulate emission standard for that source, such that any violation of the opacity limit accurately indicates a violation of the applicable particulate emission standard. An opacity limit established pursuant to RCW 70.94.331(2)(c) is referred to as an alternate opacity limit in this order. Any alternate opacity limit that would result in increasing air contaminant emissions in any nonattainment area shall only be granted if equal or greater emission reductions are

provided for by the same source obtaining the revised opacity limit.

B. On March 1, 1990 the Spokane County Air Pollution Control Authority ("SCAPCA") Board of Directors adopted Order No. 90-2. Order No. 90-2 establishes an alternate opacity limit for the melter and holder furnaces at Kaiser Aluminum & Chemical Corporation's Trentwood Works in Spokane County, Washington.

C. Since the adoption of Order No. 90-2 the United States Congress and the Washington legislature have enacted sweeping changes to state and federal air pollution control legislation. These changes compel certain revisions to Order No. 90-2.

D. The current particulate emission standard for the Trentwood melter and holder furnaces is 0.10 grains per dry standard cubic foot, pursuant to WAC 173-400-060 and SCAPCA Regulation II, § 4.01B. Through a series of tests Kaiser represented that emissions from a Trentwood melter or holder furnace with an average opacity of 24 percent during a one hour period will not exceed the grain loading limit. Kaiser also represented that the hourly average opacity of melter and holder furnace emissions does not exceed 10 percent more than 4 percent of the time.

E. SCAPCA has determined that the alternate opacity limit established by this Order will not allow any increase in actual or allowable emissions from the Trentwood Works melter and holder furnaces.

F. SCAPCA has determined that the requirements of RCW 70.94.331(2)(c) have been met.

G. Kaiser submitted an Environmental Checklist on the alternate opacity limit. Prior to the date of this Order SCAPCA, in its capacity as lead agency, issued a determination of nonsignificance on the proposed Order.

H. On December 12, 1991 the SCAPCA Board and the Washington Department of Ecology held a joint public hearing on the adoption of this Order, and on its inclusion within the proposed State Implementation Plan for the Spokane County PM-10 Non-Attainment Area. Notice of the hearing was published in the Spokane Spokesman-Review more than 30 days prior to the hearing, and mailed to the Regional Administrator of the Environmental Protection Agency.

II. ORDER

Based on the above information and findings, it is hereby ORDERED:

1. Within three months of the date of adoption of this Order Kaiser shall develop and, upon approval of the Control Officer, implement an operation and maintenance plan for minimizing air pollution from the Trentwood melter and holder furnaces. At a minimum, the operation and maintenance plan shall address procedures for startup, upset conditions (including failure of opacity monitors), timely access for SCAPCA compliance personnel, segregation of scrap material and procedures for calculation of

two years and subject to review and approval by the Control Officer. Biennial updates shall include any measures adopted pursuant to Paragraph 8(e)(iii) of this order.

2. At all times, including during startup, shutdown, maintenance and upset conditions, Kaiser shall maintain and operate each melter and holder furnace at the Trentwood Works in a manner consistent with good air pollution control practice for minimizing emissions.

3. Within 24 months of the date upon which EPA approves this order as part of the Washington State Implementation Plan Kaiser shall install and commence operation of continuous opacity monitors on each melter and holder furnace stack. Such monitors shall meet EPA Performance Specification 1, 40 CFR Part 60, Appendix B (1990).

4. The average opacity from any melter or holder furnace stack at the Trentwood Works shall not exceed 24 percent during any 60 minute operating interval.

5. The average hourly opacity from the melter and holder stacks at the Trentwood Works shall not exceed 10 percent during more than 4 percent of the Operating Hours in a month. For purposes of this order an Operating Hour means any 60 minute period in which charging, melting, fluxing, skimming, holding or discharging processes are occurring in a furnace. Compliance shall be determined by dividing the total number of Operating Hours in which a melter or holder recorded an average opacity rate of greater than 10 percent by the aggregate number of Operating Hours in a calendar month, and multiplying this fraction by 100.

of greater than 10 percent by the aggregate number of Operating Hours in that month, and multiplying this fraction by 100.

6. In addition to the other restrictions contained in this order, the average opacity from any melter or holder furnace stack at the Trentwood Works shall not exceed 40 percent during any 30 minute operating interval.

7. Compliance with the opacity limit described in paragraph 5 shall be determined using the opacity monitors described in paragraph 3. Compliance with the opacity limit described in paragraph 6 shall be determined by visual observations recorded by certified smoke readers, using the certification and observation procedures set forth in 40 CFR Part 60, Appendix A, Method 9 (1990). Compliance with the opacity limit described in paragraph 4 shall be determined by either of these methods.

8. By the 15th day of each month Kaiser shall mail to SCAPCA a summary of the opacity values for the preceding month. Each report shall include the following information:

- a) The total number of Operating Hours for each melter and holder furnace for the month;
- b) The number of Operating Hours during which each furnace exceeded an average opacity of 10 percent;
- c) The number of 60 minute operating intervals during which each furnace had an average opacity above 24 percent;
- d) The number of hours for each furnace that the opacity monitor was not operational;

- i) The time, duration, magnitude and furnace(s) involved;
- ii) The probable cause or causes;
- iii) Actions planned to prevent any recurrence.

The reporting requirements of this paragraph shall terminate when Kaiser commences reporting permit deviations under the terms of an air operating permit issued to the Trentwood Works.

9. The alternate opacity limit established by this order applies solely to Trentwood Works melter and holder furnaces in existence on the effective date of this order. For those emissions units it supersedes the opacity limits prescribed by WAC 173-400-040(1), SCAPCA Regulation 1, § 6.02(A), and SCAPCA Order No. 90-2. SCAPCA reserves the right to determine Reasonably Available Control Technology (RACT) for Trentwood remelt furnaces as provided in RCW ch. 70.94 and SCAPCA regulations, and to revise this order if necessary to incorporate any additional restrictions imposed as a result of that determination.

10. SCAPCA or Ecology shall enforce this order pursuant to ch. 70.94 RCW. Upon approval of this order by EPA as part of the Washington State Implementation Plan, it shall be enforceable in accordance with the federal Clean Air Act.

11. The alternate opacity limit described in this order shall take effect, for each furnace, upon fulfillment of three conditions: (1) submission to and approval by the Control Officer of a report demonstrating that the opacity monitor installed on that furnace meets the performance specifications set forth in 40

conditions: (1) submission to and approval by the Control Officer of a report demonstrating that the opacity monitor installed on that furnace meets the performance specifications set forth in 40 CFR Part 60, Appendix B, Performance Specification 1 (1990); (2) approval by the Control Officer of a quality assurance plan for the opacity monitor; and (3) commencement of continuous operation of the monitor. SCAPCA shall use Recommended Quality Assurance Procedures For Opacity Continuous Emission Monitoring Systems (EPA 340/1-86-010) as a guideline for approving the QA plan. The Control Officer shall act on any submittal received under this paragraph within 30 days of its submission. Compliance with this condition may be demonstrated separately for each furnace.

12. Order No. 90-2 is revoked, effective immediately.

DATED this 12th day of December, 1991.

SPOKANE COUNTY AIR POLLUTION CONTROL
AUTHORITY BOARD OF DIRECTORS








