

SCAPCA ORDER  
ISSUED IN ACCORDANCE WITH  
RCW 70.94.141 - RCW 70.94.170 AND SCAPCA REGULATION 1,  
SECTION 2.01, 2.02, AND 2.05

ORDER #96-04

ORDER TO ESTABLISH VOLUNTARY EMISSIONS LIMITS FOR KAISER ALUMINUM  
& CHEMICAL CORPORATION'S SKIM COOLER PURSUANT TO WAC 173-400-091

DATE: April 24, 1996  
DATE MODIFIED: May 8, 1996 (correction to Order #)  
ISSUED TO: Kaiser Aluminum & Chemical Corporation  
SITE LOCATION: Trentwood Works  
15000 E Euclid Avenue  
Spokane, Wa  
FACILITY CONTACT: Pat Blau  
(509)927-6350  
MAILING ADDRESS: PO Box 15108  
Spokane, Wa 99215-5108  
SOURCE: Skim Cooler, RM-20  
Secondary Aluminum Production Facility

Kaiser Aluminum & Chemical Corporation (Kaiser) operates a secondary aluminum production facility at 15000 E. Euclid Avenue, Spokane, Wa.

Kaiser's skim cooler has the potential to emit about 22 tons of particulate matter (PM) per year as calculated assuming maximum allowable emissions of 0.025 grains per dry standard cubic foot. As part of the attainment demonstration in the State Implementation Plan (SIP), emissions were modeled, including those from Kaiser's skim cooler. Kaiser's assumed emissions for this modeling exercise were higher than actual emissions but much lower than the potential to emit. In an effort to maintain the validity of the SIP attainment demonstration, Kaiser has voluntarily requested that PM10 emissions from the skim cooler be limited to a level such that Kaiser's potential to emit will be equal to or less than the levels used for the SIP modeling. As allowed in WAC 173-400-091, Kaiser has requested, in Raymond J. Milchovich's letter, dated August 8,

1995, voluntary emission limits on the skim cooler's potential to emit.

Source testing at the facility has shown that PM emissions are below 0.01 grains per dry standard cubic foot, corresponding to 50.0 pounds of PM emitted per day.

Kaiser's request has been reviewed by SCAPCA. The following potential to emit limitation shall be met by the facility as required in D. below:

1. PM10 emissions from the skim cooler shall not exceed 50.0 pounds per day.

To ensure that the above emission limit is met, the facility shall meet the following:

A. SCAPCA may require testing to verify compliance with the 50.0 pounds per day PM10 emission limit. Testing shall be done in accordance with EPA reference methods as found in 40 CFR Part 51 (1995). PM emissions shall be determined from the average of three valid 1-hour, or longer, test runs.

PM10 emissions shall be assumed to equal PM emissions unless Kaiser provides appropriate technical documentation to demonstrate otherwise. Upon submittal of such documentation, SCAPCA may revise the method for determining PM10 emissions.

B. An operation and maintenance plan for the skim cooler baghouse shall be developed and submitted to SCAPCA for approval within 30 days of the effective date of this order. The plan shall include, at a minimum:

- routine maintenance activities, required to keep the control system in proper operating condition, including manufacturer recommended operation and maintenance procedures
- a description of recordkeeping activities, including those records being kept, method(s) of recordkeeping, and length of time that records are kept.

C. Maintenance records shall be kept for the baghouse. Compliance with this condition may be demonstrated by implementing a computerized preventative maintenance system that regularly schedules and tracks maintenance activities. All records shall be kept for a minimum of two years.

D. This order shall take effect upon EPA approval of SCAPCA Order 91-01 as part of the Washington State Implementation Plan.

Any proposed deviation from this order shall require revision or revocation of this order. The revision or revocation shall occur prior to the deviation.

This order does not relieve the proponent of the obligation to comply with all other applicable federal, state and local regulations and requirements.

The provisions of this authorization are severable and, if any provision of this order, or the application of any provision of this order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this order shall not be affected thereby.

This order may be appealed to

Pollution Control Hearings Board  
c/o Environmental Hearings Office  
PO Box 40903  
4224 6th Avenue SE, Building #2, Rowe Six  
Lacey, Wa 98504-0903

Appeals must be filed within 30 days after receipt of this order. Concurrently a copy of the appeal must be sent to the Spokane County Air Pollution Control Authority, West 1101 College Avenue, Room 403, Spokane, Wa 99201.

ORDERED BY:

  
ERIC P. SKELTON  
DIRECTOR