
**SCAPCA ORDER
ISSUED IN ACCORDANCE WITH :**

**RCW 70.94.141 - RCW 70.94.170 AND SCAPCA REGULATION I, SECTION
2.01, 2.02, AND 2.05**

ORDER #96-05

**ORDER TO ESTABLISH VOLUNTARY EMISSIONS LIMITS FOR KAISER ALUMINUM &
CHEMICAL CORPORATION'S REMELT HOLDERS & VENTED SNIF UNITS PURSUANT TO
WAC 173-400-091**

DATE: April 24, 1996
DATE MODIFIED: May 8, 1996 (correction to Order #)
DATE MODIFIED: October 4, 2000 (Addition of Startup/Shutdown Opacity Limit
& Addition of Condition G)

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: P.O. Box 15108
Spokane, WA 99215-5108

SOURCE: Remelt Holders: RM(H)-1, RM(H)-2, RM(H)-3, RM(H)-4, RM(H)-
5, RM(H)-6, RM(H)-7, RM(H)-8
Vented SNIF Units
Secondary Aluminum Production Facility

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

Kaiser's remelt holders and SNIF units that are vented to the dry scrubbing baghouse system (i.e., vented SNIF units) have the potential to emit over 200 tons of particulate matter (PM) per year as calculated assuming maximum allowable emissions of 0.1 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 remelt holders. 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 remelt holders 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 remelt holders' potential to emit. Revisions to this order have been made as requested in Patrick Blau's letter, dated March 10, 1999.

A dry scrubbing/baghouse system has been designed and installed to control the emissions from the remelt holders and vented SNIF units. Emissions from the dry scrubbing/baghouse system will not exceed 0.015 grains per dry standard cubic foot as required in Notice of Construction #660. Although the grainloading standard of 0.015 corresponds to 215 pounds of PM emitted per day, this order will limit emissions to 83 pounds per day, providing further assurance that facility-wide PM10 emissions are below the level used in the SIP modeling.

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

1. Total PM10 emissions from the 8 remelt holders; RM(H)-1, RM(H)-2, RM(H)-3, RM(H)-4, RM(H)-5, RM(H)-6, RM(H)-7, RM(H)-8 and vented SNIF units shall not exceed 83.0 pounds per day.

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

A. Emissions from the 8 remelt holders and vented SNIF units listed in 1. above shall be controlled using the dry scrubbing/baghouse system.

B. Except during periods of startup and shutdown, visible emissions from the dry scrubbing/baghouse system, as measured using EPA Method 9, except that a three minute average shall be calculated instead of a six-minute average, shall not exceed 10% (three-minute average). Visible emissions from the dry scrubbing/baghouse system, as determined by the continuous opacity monitor, shall not exceed 10% (three-minute average). The opacity monitor data shall be collected in accordance with 40 CFR 60.13 (1995) except that one cycle of data recording shall be a three minute average and each three minute average shall be calculated from 18 or more datapoints, equally spaced over each three minute period.

During periods of startup and shutdown, visible emissions from the dry scrubbing/baghouse system, as measured using EPA Method 9 (except that a three-minute average shall be calculated instead of a six-minute average) or the continuous opacity monitor, shall not exceed 20% (three-minute average).

C. SCAPCA may require testing to verify compliance with the emission limit in Condition 1 of this order. Testing shall be done in accordance with EPA reference methods as found in 40 CFR Parts 51 and/or 60 (1995). PM and/or PM10 emissions shall be determined from the average of three valid 1-hour, or longer, test runs and shall include front and back half particulate matter.

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.

D. An operation and maintenance plan for the dry scrubbing/baghouse control system shall be developed and submitted to SCAPCA for approval within 30 days of start-up of the dry scrubbing/baghouse system. 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.

E. 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.

F. This order shall take effect after:

- i) October 31, 1996; and
- ii) EPA approval of SCAPCA Order 91-01 as part of the Washington State Implementation Plan.

G. Daily allowable emissions from the dry scrubbing baghouse system may be increased above the levels allowed in this order if such increases are approved under SCAPCA's new source review program as being in compliance with WAC 173-400-112 and WAC 173-400-113. Any such approval, issued under SCAPCA's new source review program, shall include new daily allowable emissions levels which supersede the levels established in this order.

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.

Kaiser Voluntary Emission Limit
Remelt Holders
SCAPCA Order #96-05
Date Issued: April 24, 1996
Date Modified: May 8, 1996
Date Modified: October 4, 2000

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
P.O. 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