Air Operating Permit

Issued in accordance with:
40 CFR Part 70, Chapter 70.94
RCW, and Chapter 173-401 WAC

3104 E. Augusta, Spokane, WA 99207 (509) 477-4727

PERMIT NO:	AOP-19 – Renewal Permit #1
ISSUANCE DATE:	July 6, 2009
EXPIRATION DATE:	July 5, 2014
PERMITTEE:	CDC Mead, LLC 1650 Des Peres Road, Suite 303 St. Louis, MO 63131
FACILITY LOCATION:	CDC Mead 2111 E. Hawthorne Rd. Mead, WA 99021
FACILITY DESCRIPTION:	Products of calcined coke and coal
PRIMARY SIC:	2999
AIRS AFS NO:	WA-063-0122
RESPONSIBLE OFFICIAL WHO SUBMITTED APPLICATION:	Mike Roberts Principal
FACILITY CONTACT:	Greg Paolino Site Manager (509) 468-5377

PREPARED BY: _____
April L. Westby

REVIEWED BY: _____
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REVIEWED BY: _____
Ronald J. Edgar, Chief of Technical Services

APPROVED BY: _____
William Dameworth, Control Officer

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LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was named SCAPCA)
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS & PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 9/16/02]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 9/16/02]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(26), 5/8/07]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(28), 5/8/07]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 9/16/02]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(57), 5/8/07]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

The following note applies throughout this permit when indicated by the term "* - see note on page 5."

NOTE: For requirements which are federally enforceable because of inclusion in the State Implementation Plan (SIP), where the current filing date in the regulation is different from the filing date for SIP approved version, but the requirement itself has not changed, the most recent filing date is given, followed by the SIP version in parentheses.

Until this permit expires, is modified, or revoked, the permittee, CDC Mead, is authorized to operate subject to the terms and conditions listed herein.

I. STANDARD TERMS & CONDITIONS

A. PERMIT ADMINISTRATION

1. Federal Enforceability. All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. [WAC 173-401-625, 10/4/93]

2. Duty to comply. The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70.94 RCW, and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

3. Schedule of Compliance. The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 10/4/93]

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the 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. [WAC 173-401-620(2)(b), 10/4/93]

5. Permit Actions. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 10/4/93]

6. Reopening for Cause. The permit shall be reopened and revised under any of the following circumstances:

a. Additional requirements become applicable to the facility and the remaining permit term is three or more years. Such reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition 15- Permit Continuation below);

b. SRCAA 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; or

c. SRCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

7. Emissions Trading. No permit revision shall be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 10/4/93]

8. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

9. Duty to provide information. The permittee shall furnish within a reasonable time to SRCAA, any information that SRCAA 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 SRCAA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SRCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 10/4/93]

10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee 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. [WAC 173-401-500(6), 9/16/02]

11. Permit Fees. The permittee shall pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]

12. Severability. If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 10/4/93]

13. Permit Appeals. This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on SRCAA within thirty days of

receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from, and additional to, any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

14. Permit Renewal and Expiration. This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SRCAA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SRCAA's receipt of a timely and complete application, the facility may continue to operate subject to final action by SRCAA on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SRCAA, any additional information identified as necessary to process the application. The application shall be sent to:

Director
Spokane Regional Clean Air Agency
3104 E. Augusta
Spokane WA 99207

[WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1), 9/16/02]

15. Permit Continuation. This permit and all terms and conditions contained herein, including any permit shield provided under Condition 16-Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance.

This permit shield shall not alter or affect the following:

a. the provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;

b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;

c. the ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;

d. the ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

(See III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

B. INSPECTION & ENTRY

17. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SRCAA, or an authorized representative, to perform the following:

a. enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. as authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 10/4/93]

Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

18. Obstruction of Access. No person shall obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credential; nor shall any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1987 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.02.E, 1/7/02 – STATE/LOCAL ONLY]

C. EMERGENCY PROVISIONS

19. Emergencies. An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met and the permittee submits notification of the emergency to SRCAA according to the shortest time period which applies to the situation as follows (See Condition 28-Prompt Reporting of Deviations):

a. as soon as possible, but no later than 12 hours after the emissions are discovered, if the emissions represent a potential threat to human health or safety;

b. within two working days of the time that the emissions limits were exceeded due to the emergency; or

c. within a shorter period of time if specified in an applicable requirement.

This provision is in addition to the affirmative defense for unavoidable excess emissions found in Condition 20-Excess Emissions and Condition 21-Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

20. Excess Emissions. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions shall be excused and not subject to penalty, if

a. the excess emissions are reported to SRCAA on the next regular working day;

b. upon request by SRCAA, the permittee submits a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence; and

c. the permittee adequately demonstrates to SRCAA's control officer that:

i. Excess emissions due to startup or shutdown conditions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

ii. Excess emissions due to scheduled maintenance could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

iii. For excess emissions due to upsets, the event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition; the event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and the operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107, 8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

21. Report of Breakdown. If pollutants are emitted in excess of the limits established by Regulation I of SRCAA as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if:

a. the upset or breakdown is reported to SRCAA on the next regular working day;

b. the permittee, upon request of SRCAA's control officer, submits a report giving: the causes; the steps to be taken to repair the breakdown; and a time schedule for the completion of the repairs; and

c. the permittee can prove to SRCAA's control officer that the excess emissions were unavoidable by adequately demonstrating that: the event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition; the event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and the operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emissions unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with Regulation I of the SRCAA or be subject to the penalties in Regulation I of the SRCAA, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints.

b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements. [SRCAA Regulation I, Section 6.08, 3/4/04 - STATE/LOCAL ONLY]

D. GENERAL MONITORING, RECORDKEEPING, & REPORTING

22. Records of Required Monitoring Information. The permittee shall keep records of monitoring information including:

a. the date, place as defined in this permit, and time of sampling and 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; and
f. the operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

23. Permanent Shutdown of an Emission Unit. If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be

required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shut down emission unit, generated while the emission unit was in operation, shall be kept in accordance with Conditions 22- Records of Required Monitoring Information and 26 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall be reported to SRCAA on the monitoring report, required under Condition 27 – Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

24. Operational Flexibility. In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

25. Records of Changes. The permittee shall keep records of changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-615(2)(b), 9/16/02]

26. Retention of Records. The permittee shall keep records of all required monitoring data and support information for a period of 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. [WAC 173-401-615(2)(c), 9/16/02]

27. Monitoring Reports. Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SRCAA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

All instances of deviations from permit requirements shall be clearly identified in such reports. In addition, any permanent emission unit shutdowns shall be reported in accordance with Condition 25- Permanent Shutdown of an Emission Unit, above. The reports shall be certified as required in Condition 33- Report Submittals. Provided, where this permit requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. [WAC 173-401-615(3)(a), 9/16/02]

28. Prompt Reporting of Deviations. The permittee shall promptly report deviations from

permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt means reporting according to the shortest time period listed below which applies to the situation:

a. in the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;

b. in the case where an affirmative defense is sought under Condition 19-Emergencies above or under Condition 20-Excess Emissions, the deviation shall be reported by phone or facsimile within two working days of the time when emission limitations were exceeded; and

c. for all other deviations, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

The permittee shall maintain a contemporaneous record of all deviations. [WAC 173-401-615(3)(b), 9/16/02]

29. Emission Inventory. The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of particulate matter, PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants, and shall be submitted no later than one hundred five days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. [WAC 173-400-105(1), 5/8/07(8/20/93)* - see note on page 5]

30. WAC 173-401-530(1)(a) Insignificant Emission Units. Emission units or activities which qualify as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725. [WAC 173-401-530(6), 9/16/02]

31. Report Submittals. All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director
Spokane Regional Clean Air Agency
3104 E. Augusta
Spokane, WA 99207

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

32. Rendering Device or Method Inaccurate. The permittee shall not render inaccurate any

monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 5/8/07 – STATE / LOCAL ONLY]

E. COMPLIANCE CERTIFICATION

33. Compliance Certification Submittals. The permittee shall submit compliance certifications once per year to SRCAA in accordance with Condition 31-Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SRCAA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 10/4/93]

34. Compliance Certification Contents. The compliance certification shall include:

a. the identification of each term or condition of the permit that is the basis of the certification;

b. the compliance status;

c. whether compliance was continuous or intermittent;

d. the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a) (see Condition 27-Monitoring Reports above); and

e. such other facts as SRCAA may, in writing, require from the permittee to determine the compliance status of the source.

Where the permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where the permit requires testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(d), 9/16/02]

35. Submittal to EPA. The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator

USEPA
MS OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[WAC 173-401-630(5)(d), 10/4/93]

F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS

36. False Information. The permittee shall not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(7), 5/8/07(8/20/93) – see note on page 5]

37. Falsification of Statements. The permittee shall not willfully make a false or misleading statement to the Board of Directors of SRCAA or their authorized representatives as to any matter within the jurisdiction of the Board. [SRCAA Regulation I, 2.08.A, 8/3/06 - STATE/LOCAL ONLY]

38. Alteration of Documents. The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SRCAA if the purpose of such reproduction or alteration is to evade or violate any provision of SRCAA Regulation I or any other law. [SRCAA Regulation I, 2.08.B, 8/3/06 - STATE/LOCAL ONLY]

39. Availability of Documents. Any order required to be obtained by SRCAA Regulation I shall be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/06 - STATE/LOCAL ONLY]

40. Posting of Notices. In the event SRCAA requires a notice to be displayed, it shall be posted. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors. [SRCAA Regulation I, 2.08.D, 8/3/06 - STATE/LOCAL ONLY]

G. APPLICABLE WHEN TRIGGERED REQUIREMENTS

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement or proposes changes to the source that trigger the applicability of the requirement. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition 33-Compliance Certification Submittals shall describe the permittee's compliance with these requirements.

41. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, 5/8/07 – STATE/LOCAL ONLY] [WAC 173-400-112,

113, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

42. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

43. Demolition and Renovation (Asbestos). The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2004] [WAC 173-400-075, 5/8/07] [SRCAA Regulation I, Article IX, 9/4/08 - STATE/LOCAL ONLY]

44. Source Testing. To demonstrate compliance, Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 Appendix A which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of July 12, 1990, on file at Ecology. All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, “Source Tests.” The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation. [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 5/8/07 – STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.09, 2/7/08]

45. Chemical Accident Prevention Provisions. A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:

a. Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR §68.130; or

b. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR Part 68, 1998]

II. EMISSION LIMITATIONS & MONITORING AND REPORTING

REQUIREMENTS

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the sixth column of the emission limitation tables. The MRRR are given at the end of this section.

Some facility-wide requirements may be repeated in emission limitation tables for individual emission units or groups of emission units if additional monitoring is required for that emission unit or group of emission units. Facility-wide requirements apply to all emission units regardless of whether they are listed in every emission limitations table unless otherwise exempted in III. PERMIT SHIELD.

A. FACILITY-WIDE EMISSION LIMITATIONS

TABLE II.A-1 lists the applicable emission limitations that apply facility-wide. These facility-wide emission limitations apply to all significant and insignificant emissions units at CDC Mead. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA.

The facility-wide emission limitations apply to insignificant emissions units. However, the monitoring, recordkeeping and reporting requirements given in II.E. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 30). [WAC 173-401-530(2)(c) & (d), 9/16/02]

TABLE II.A-1 - Facility-wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
46	WAC 173-400-040, 8/20/93 WAC 173-400-040, 1/10/05 – STATE/LOCAL ONLY	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040 – STATE/LOCAL ONLY			No MRRR Required
47	WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05 (8/20/93) – see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period	1M, 3M, 9M, 13M
48	SRCAA Regulation I, 6.02, 9/1/05 - STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (July 12, 1990)	3 minute aggregate in any 1 hour period	1M, 3M, 9M, 13M
49	WAC 173-400-040(2), 1/10/05 - STATE/LOCAL ONLY SRCAA Regulation I, 6.05.A, 3/4/04(11/12/93)* - see note on page 5	No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited			2M
50	SRCAA Regulation I, 6.05.C, 3/4/04(11/12/93)* - see note on page 5 SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(3)(a), 1/10/05(11/12/93)* - see note on page 5 SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(8)(a), 1/10/05(8/20/93)* - see note on page 5	Reasonable precautions must be taken to: a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads; b. Prevent tracking of PM onto paved roadways open to the public; c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA; d. Prevent PM from becoming airborne when handling,			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		transporting, and /or storing PM; and e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.			
51	WAC 173-400-040(4), 1/10/05- STATE/LOCAL ONLY	Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4)			2M
52	SRCAA Regulation, 6.04, 3/4/04 - STATE/LOCAL ONLY	Effective control apparatus and measures shall be installed and operated to reduce odor-bearing gases and particulate matter to a reasonable minimum – STATE/LOCAL ONLY			2M
53	WAC 173-400-040(5), 1/10/05(8/20/93)* - see note on page 5 SRCAA Regulation I, 6.06.A, 3/4/04 - STATE/LOCAL ONLY	No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business – STATE/LOCAL ONLY			2M
54	WAC 173-400-040(7), 8/15/01(8/20/93)* - see note on page 5 SRCAA Regulation, 6.07, 1/13/99 - STATE/LOCAL ONLY	No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC – STATE/LOCAL ONLY			No MRRR Required
55	WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01(2/19/91)* - see note on page 5 NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SRCAA to	Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3)	RM 5 (July 1, 1993) or procedures in WAC 173-400-050 approved per Condition 44- Source Testing	average of three one- hour tests	9M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	be representative of normal operations.				
56	WAC 173-400-060, 2/19/91 WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (July 1, 1993) or procedures in WAC 173-400-060 approved per Condition 44- Source Testing	average of three one- hour tests	1M, 3M, 13M
57	WAC 173-400-040(6), 1/10/05(8/20/93)* - see note on page 5 NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY	SO2 emissions from each unit shall not exceed 1000 ppm on a dry basis corrected to 7% oxygen, as specified in WAC 173-400-040(6) NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY	Procedures in WAC 173-400-105(4) approved per Condition 44- Source Testing	any period of 60 con-secutive minutes	5M, 8M, 9M
58	WAC 173-400-200, 1/10/05(2/19/91)* - see note on page 5	No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200.			No MRRR Required
59	WAC 173-400-205, 2/19/91	No varying of emissions according to atmospheric conditions or ambient concentrations is allowed, except as allowed under WAC 173-400-205			No MRRR Required
60	Chapter 173-425 WAC, 3/13/00(10/18/90)* - STATE/LOCAL ONLY SRCAA Regulation I, 6.01, 3/4/04 - STATE/LOCAL ONLY	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA Regulation I, 6.01			No MRRR Required
61	40 CFR Part 82, 2006	Handling and use of chlorofluorocarbons (CFCs) must be in accord with 40 CFR Part 82			No MRRR Required

B. GREEN CARBON AREA EMISSION LIMITATIONS

This section of the permit covers the green carbon area and associated activities. The units covered are listed in Table II.B-1.

Table II.B-1 – Green Carbon Area Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Coke Unloading (52NW) – SRCAA Order 09-02 (V)	3-1	None	Baghouse (4,160 dscfm)
Green carbon scrap & coke crushing / storage / transfer / batching / ball mill – SRCAA Order 09-02 (VI)	3-7	None	Baghouse (32,000 dscfm)
Green carbon vacuum system – SRCAA Order 09-02 (IV)	3-10	None	Baghouse (2,000 dscfm)

Table II.B-2 provides the applicable requirements for the emission units listed in Table II.B-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.B-2 – Green Carbon Area Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
62	SRCAA Order 09-02 (V), Condition 1, 7/6/09 SRCAA Order 09-02 (VI), Condition 1, 7/6/09 SRCAA Order 09-02 (IV), Condition 1, 7/6/09	3-1, 3-7 & 3-10: Particulate matter from the baghouse stack shall not exceed 0.01 gr/dscf.	EPA Method 5 (front half) or 17 (front half)		3M, 13M
63	SRCAA Order 09-02 (V), Condition 2, 7/6/09 SRCAA Order 09-02 (VI), Condition 2, 7/6/09 SRCAA Order 09-02 (IV), Condition 2, 7/6/09	3-1, 3-7 & 3-10: Opacity from the baghouse stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period.	EPA Method 9	Six consecutive minutes in any 60-minute period	3M, 13M

64	SRCAA Order 09-02 (V), Condition 4, 7/6/09 SRCAA Order 09-02 (VI), Condition 4, 7/6/09 SRCAA Order 09-02 (IV), Condition 4, 7/6/09	3-1, 3-7 & 3-10: At all times, including periods of abnormal operation and upset, the permittee shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.			3M, 4M

C. BAKED CARBON AREA EMISSION LIMITATIONS

This section of the permit covers the baked carbon area and associated activities. The units covered are listed in Table II.C-1.

Table II.C-1 – Baked Carbon Area Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Two anode baking furnaces Buildings 300 & 53– SRCAA Order 09-02 (VII)	4-1	Natural Gas	Scrubber (78,000 dscfm)
North Anode Cleaner – SRCAA Order 09-02 (VII)	4-2	None	Baghouse (6,360 dscfm)
South Anode Cleaner – SRCAA Order 09-02 (VII)	4-3	None	Baghouse (8,400 dscfm)

Table II.C-2 provides the applicable requirements for the emission units listed in Table II.C-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.C-2 – Baked Carbon Area Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
65	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Carbon monoxide (CO) emissions shall not exceed 940.6 tons per year	EPA Reference Methods given in 40 CFR 60, Appendix A or B	Average of three eight hour test runs	5M, 6M

66	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Nitrogen oxide (NOx) emissions shall not exceed 123.6 tons per year.	EPA Reference Methods given in 40 CFR 60, Appendix A or B	Average of three eight hour test runs	5M, 6M
67	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Volatile organic compound (VOC) emissions shall not exceed 248 tons per year.	EPA Reference Methods given in 40 CFR 60, Appendix A or B	Average of three eight hour test runs	5M, 6M
68	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Sulfur dioxide (SO2) emissions shall not exceed 2700 pounds per day.	EPA Reference Methods given in 40 CFR 60, Appendix A or B	Average of three one hour test runs	5M, 6M
69	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Particulate matter emissions shall not exceed 80 pounds per day and 0.005 gr/dscf.	EPA Reference Method 5 (front half) or 17 (front half)		5M, 6M, 7M
70	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Fluoride emissions shall not exceed 0.02 pounds per ton of green anode baked.	EPA Reference Methods in 40 CFR 60, Appendix A		5M, 7M
71	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Opacity from the stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period	EPA Method 9	Six consecutive minutes in any 60-minute period	7M
72	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-1: Polycyclic Aromatic Hydrocarbons (PAHs) emissions, including benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, and benzo(a)pyrene, shall not exceed 0.056 tons of PAHs per year.	Speciation of the extractable method from EPA Reference Method 315		5M

73	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-2 & 4-3: Particulate matter emissions shall not exceed 0.005 gr/dscf.	EPA Method 5 (front half) or 17 (front half)		3M, 13M
74	SRCAA Order 09-02 (VII), Condition 1, 7/6/09	4-2 & 4-3: Opacity from each stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period	EPA Method 9	Six consecutive minutes in any 60-minute period	3M, 13M
75	SRCAA Order 09-02 (VII), Condition 3, 7/6/09	4-1, 4-2 & 4-3: At all times, including periods of abnormal operation and upset, the permittee shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.			3M, 4M

D. ANCILLARY OPERATIONS EMISSION LIMITATIONS

This section of the permit covers the ancillary operations and associated activities. The units covered are listed in Table II.D-1.

Table II.D-1 – Ancillary Operations Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Railcar unloading / south hopper / fresh ore storage / transfer – SRCAA Order 09-02 (VIII)	8-4	None	Baghouse #480 (23,262 dscfm)
Ore storage / transfer – SRCAA Order 09-02 (II)	8-6	None	Baghouse #477 (5,633 dscfm)
Ore storage airlift / slides – SRCAA Order 09-02 (II)	8-7	None	Baghouse #475 (6,359 dscfm)
Boilers 1 & 2; standby boilers, each rated at 25.2 MMBtu/hr – SRCAA Order 09-02 (III)	8-32	Natural Gas	None
Boiler 3; main boiler, rated at 60 MMBtu/hr – SRCAA Order 09-02 (III)	8-33	Natural Gas	None

Table II.D-2 provides the applicable requirements for the emission units listed in Table II.D-1. Requirements that are not required under the FCAA are indicated by the phrase

"STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.D-2 – Ancillary Operations Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
76	SRCAA Order 09-02 (VIII), Condition 1, 7/6/09SRCAA Order 09-02 (II), Condition 1, 7/6/09	8-4, 8-6 & 8-7: Particulate matter from the baghouse stack shall not exceed 0.01 gr/dscf.	EPA Method 5 (front half) or 17 (front half)		3M, 13M
77	SRCAA Order 09-02 (VIII), Condition 2, 7/6/09 SRCAA Order 09-02 (II), Condition 2, 7/6/09	8-4, 8-6 & 8-7: Opacity from the baghouse stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period.	EPA Method 9	Six consecutive minutes in any 60-minute period	3M, 13M
78	SRCAA Order 09-02 (VIII), Condition 4, 7/6/09 SRCAA Order 09-02 (II), Condition 4, 7/6/09	8-4, 8-6 & 8-7: At all times, including periods of abnormal operation and upset, the permittee shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.			3M, 4M
79	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-33: Nitrogen oxides emission concentrations when firing natural gas shall not exceed 40 ppmv @ 3% O2.	EPA Reference Method 7E and 19		8M, 9M
80	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-33: Carbon monoxide emission concentrations when firing natural gas shall not exceed 200 ppmv @ 3% O2.	EPA Reference Method 10 and 19		8M, 9M
81	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32: Nitrogen oxides emission concentrations in the boiler plenum when firing natural gas shall not exceed 130 ppmv @ 3% O2.	EPA Reference Method 7E and 19		8M, 9M
82	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32: Carbon monoxide emission concentrations in the boiler plenum when firing natural gas shall not exceed 400 ppmv @ 3% O2.	EPA Reference Method 10 and 19		8M, 9M

83	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Particulate emissions from any combination of boiler operation shall not exceed 1.9 tons per year.	EPA Reference Method 5 (front half) or 17 (front half)		8M, 9M, 10M
84	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Sulfur dioxide emissions from any combination of boiler operation shall not exceed 1.5 tons per year.	EPA Reference Methods in 40 CFR 60, Appendix A or B		8M, 9M, 10M
85	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Volatile organic compound emissions from any combination of boiler operation shall not exceed 0.8 tons per year.	EPA Reference Method 25A		8M, 9M, 10M
86	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Carbon monoxide emissions from any combination of boiler operation shall not exceed 27.8 tons per year.	EPA Reference Methods in 40 CFR 60, Appendix A or B		8M, 9M, 10M
87	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Nitrogen oxides emissions from any combination of boiler operation shall not exceed 10.9 tons per year.	EPA Reference Methods in 40 CFR 60, Appendix A or B		8M, 9M, 10M
88	SRCAA Order 09-02 (III), Condition 1, 7/6/09	8-32 & 8-33: Opacity from the boiler stacks shall not exceed 5% for more than six consecutive minutes in any sixty-minute period.	EPA Reference Method 9	Six consecutive minutes in any 60-minute period	8M, 9M
89	SRCAA Order 09-02 (III), Condition 3, 7/6/09	8-32 & 8-33: The boilers shall burn exclusively pipeline quality natural gas.			No MRRR required
90	SRCAA Order 09-02 (III), Condition 4, 7/6/09	8-32: If the annual average pounds per hour of steam generated by the main boiler exceeds 37,500 pounds per hour, SRCAA may require more frequent source testing for carbon monoxide and nitrogen oxide.			11M

91	SRCAA Order 09-02 (III), Condition 5, 2/26/04	8-32 & 8-33: At all times, including periods of abnormal operation and upset, the permittee shall, to the extent practicable, maintain the facility, and operate and maintain air pollution control equipment in a manner consistent with good air pollution control practice.			4M, 9M

E. MAINTENANCE OPERATIONS EMISSION LIMITATIONS

This section of the permit covers the maintenance operations and associated activities. The units covered are listed in Table II.E-1.

Table II.E-1 – Maintenance Operations Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Brick crusher – SRCAA Order 09-02 (I)	9-5	None	None

Table II.E-2 provides the applicable requirements for the emission units listed in Table II.D-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

Table II.E-2 – Maintenance Operations Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
92	SRCAA Order 09-02 (I), Condition 1, 7/6/09	9-5: Bricks to be crushed must be thoroughly wetted in the charge bucket prior to feeding the jaw crusher.			12M
93	SRCAA Order 09-02 (I), Condition 2, 7/6/09	9-5: No visible emissions shall be present during operation of the jaw crusher.			1M, 12M
94	40 CFR 60.672(c), 10/17/00 WAC 173-400-115, 5/8/07	9-5: Fugitive emissions from the crusher shall not exceed 15% opacity	EPA Method 9 and the procedures in §60.11 with the additions given in §60.675		1M, 12M

F. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

1M. The permittee shall meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

a) The permittee shall perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from the following emission points:

- Anode paste scrubber, 3-14;
- Mead-crete brick crusher, 9-5; and
- Masonry saw, 9-7.

The weekly inspections shall be conducted as follows:

1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

b) If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:

1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2),and/or, b) 3) are not being met, corrective action must be taken as soon as

possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1) and c) 2).

1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 1993) or Ecology Method 9A (July 12, 1990), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.

2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall perform, or have performed, RM 5 (July 1, 1993) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions, unless SRCAA approves an alternate timeframe. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

2M. The permittee shall meet the requirements given in a) and b), and if triggered, the permittee shall meet the requirements given in c).

a) The permittee shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the "MRRR Reference" column in the above tables is being met. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good

practices or procedures or effective control apparatus and measures, see 2M.d) below. Records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

b) The permittee shall record and investigate complaints received regarding air quality problems. Complaints shall be investigated as soon as possible, but no later than 8 hours of receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 2M.d) below. Records shall be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. Records shall be kept in accordance with Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

c) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if the problem is solved as soon as possible, but no later than 24 hours of first observing the problem, unless SRCAA approves an alternate timeframe. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations. Records shall be kept of all correction action(s) taken by the permittee. Records shall be kept in accordance with Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

d) The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.

i. Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:

A. Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness;

B. Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air;

C. Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials;

D. Minimizing the free fall distance, i.e., drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc…

E. Maintaining adequate freeboard and/or covering loads when transporting PM containing material;

F. Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc… and/or using tarps, chemical dust suppressants, vegetation, etc.. to minimize releases to air;

G. Keeping paved surfaces clean to minimize re-entrainment of PM into the ambient air; and/or

H. Limit vehicle speed to less than 15 miles per hour on unpaved areas.

ii. Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:

A. Paving unpaved traveled surfaces;

B. Gravelling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness;

C. Paving or installing quarry spalls[1] at exit aprons;

D. Cleaning vehicle tires and undercarriages before exiting to paved public roadways; and/or

E. Promptly cleaning material that has been tracked out onto paved public roadways.

iii. Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:

A. Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials;

B. Using solvent containing materials with lower vapor pressures;

C. Keeping unused or partially used containers of organic solvent containing materials closed, except when in use;

D. Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers; and/or

E. Keeping all disposable materials which contain organic solvents in closed containers.

iv. Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:

[1] A quarry spall, aka rock entrance, is a buffer area consisting of very large aggregate, usually 4 to 8 inch crushed rock, which jars material free from tires and undercarriages.

A. Keeping odorous materials in closed containers or confined within a building;

B. Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses;

C. Using scrubbers or other add-on control equipment to control odors;

D. Using materials which release less odorous compounds;

E. Disposing of odorous, or potentially odorous, materials promptly; and/or

F. Operating and maintaining equipment and processes in a manner that minimizes odors.

[WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

3M. This condition applies to the following baghouses:

- Coke unloading baghouse (3-1);
- Green scrap & coke crusher/storage/transfer/batching, ball mill baghouse (3-7);
- Green carbon vacuum system baghouse (3-10);
- North anode cleaner baghouse (4-2);
- South anode cleaner baghouse (4-3);
- Railcar unloading / south hopper, fresh ore storage / transfer baghouse #480 (8-4);
- Ore storage/transfer baghouse #477 (8-6); and
- Ore storage, airlift/slides baghouse #475 (8-7).

A baghouse functional integrity inspection shall be conducted on a weekly basis when the equipment is in operation that, at a minimum, includes visual checks for the following: visible emissions, leaks in the ductwork and housing, excess vibration, pressure drop, and sight glass readings (if available). If visible emissions, leaks, excess vibration, and/or out-of-range pressure drop readings are observed at any time from the baghouse, corrective action shall be initiated as soon as practical, but no later than 24 hours after the problem is observed. Records shall be kept of all inspections and corrective actions in accordance with Condition 26 – Retention of Records and upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [SRCAA Order 09-02 (V), Condition 3, 7/6/09] [SRCAA Order 09-02 (VI), Condition 3, 7/6/09] [SRCAA Order 09-02 (IV), Condition 3, 7/6/09] [SRCAA Order 09-02 (VII), Condition 2, 7/6/09] [SRCAA Order 09-02 (VIII), Condition 3, 7/6/09] [SRCAA Order 09-02 (II), Condition 3, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

4M. The permittee shall implement the operation and maintenance procedures and recommended operational settings in the operation and maintenance (O&M) plan developed for the equipment (manufacturer's manuals are acceptable). A copy of the O&M plan shall be available for inspection by SRCAA staff or other authorized representatives. Records shall be kept to document that the operating and maintenance procedures are being followed. Records shall include information required in Condition 22- Records of Required Monitoring Information. Records shall be kept in accordance with Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized

representatives. [SRCAA Order 09-02 (V), Condition 4, 7/6/09] [SRCAA Order 09-02 (VI), Condition 4, 7/6/09] [SRCAA Order 09-02 (IV), Condition 4, 7/6/09] [SRCAA Order 09-02 (VII), Condition 3, 7/6/09] [SRCAA Order 09-02 (VIII), Condition 4, 7/6/09] [SRCAA Order 09-02 (II), Condition 4, 7/6/09] [SRCAA Order 09-02 (III), Condition 5, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

5M. When the anode baking furnaces are in operation, the permittee shall perform emission testing at the stack of the main air control system associated with the anode baking furnaces, in accordance with Regulation I, Section 2.09, as follows:

a) No less than once every three calendar months, the permittee shall test for:
   i. Sulfur dioxide, using EPA Reference Methods in 40 CFR 60, Appendix A or B, based on the average of three one-hour test runs;
   ii. Particulate Matter, using EPA Reference Method 5 (front half) or 17 (front half); and
   iii. Fluorides, using EPA Reference Methods in 40 CFR 60, Appendix A.

b) No less than once every six calendar months, the permittee shall test for:
   i. Polycyclic Aromatic Hydrocarbons (PAHs), using speciation of the extractable matter from EPA Reference Method 315.

c) No less than once every year, the permittee shall test for:
   i. Carbon monoxide, using EPA Methods in 40 CFR 60, Appendix A or B based on the average of three eight-hour test runs;
   ii. Nitrogen oxides, using EPA Methods in 40 CFR 60, Appendix A or B based on the average of three eight-hour test runs; and
   iii. Volatile Organic Compounds, using EPA Methods in 40 CFR 60, Appendix A or B based on the average of three eight-hour test runs.

[SRCAA Order 09-02 (VII), Condition 1, 7/6/09] [SRCAA Regulation I, Section 2.09, 2/7/08]

6M. The permittee shall calculate the daily SO2 and PM emissions and annual CO, NOx, and VOC emissions as follows:

a) The sulfur dioxide mass emission rate (pounds per hour) measured during the most recent source test shall be multiplied by 24 hours per day to determine the pounds per day of sulfur dioxide.

b) The particulate matter mass emission rate (pounds per hour) measured during the most recent source test shall be multiplied by 24 hours per day to determine the pounds per day of particulate matter.

c) The carbon monoxide mass emission rate (pounds per hour) determined from the most recent source test shall be divided by the average tons of carbon anodes produced during the month of the source test to derive the pounds of carbon monoxide per ton of carbon anodes produced. This factor is to be multiplied by the tons of carbon anodes produced during the 12 preceding months beginning with the month during which the source test was

made to determine the tons per year of carbon monoxide.

d) The nitrogen oxides mass emission rate (pounds per hour) determined from the most recent source test shall be divided by the average tons of carbon anodes produced during the month of the source test to derive the pounds of nitrogen oxides per ton of carbon anodes produced. This factor is to be multiplied by the tons of carbon anodes produced during the 12 preceding months beginning with the month during which the source test was made to determine the tons per year of nitrogen oxides.

e) The volatile organic compounds mass emission rate (pounds per hour) determined from the most recent source test shall be divided by the average tons of carbon anodes produced during the month of the source test to derive the pounds of volatile organic compounds per ton of carbon anodes produced. This factor is to be multiplied by the tons of carbon anodes produced during the 12 preceding months beginning with the month during which the source test was made to determine the tons per year of volatile organic compounds.

[SRCAA Order 09-02 (VII), Condition 1, 7/6/09]

7M. This condition shall function as Compliance Assurance Monitoring for particulate matter and fluoride emissions from the anode baking furnaces.

a) Opacity

1) The permittee shall operate a continuous opacity monitoring system (COMs) on the main air control system stack associated with the anode baking furnaces. The COMs shall meet the minimum data recovery requirements given in 40 CFR 60.13(e). Opacity records shall be kept in accordance with Condition 26 – Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

2) Any time the 6-minute average opacity from the main air control system stack exceeds 5%, the permittee shall report the opacity exceedance to SRCAA within 24 hours of the exceedance and provide a full detailed report of all opacity exceedances to SRCAA in a monthly report. In addition, as soon as possible, but no later than 30 days after the opacity exceedance, unless SRCAA approves an alternate timeframe, the permittee shall perform, or have performed source testing for particulate matter and fluoride emissions from the main air control system stack. All source testing shall be done in accordance with SRCAA Regulation I, Section 2.09.

3) The permittee shall report all opacity, particulate matter, and/or fluoride emissions exceedances to SRCAA as part of the semiannual monitoring report, described in Condition 27. The report shall include the date, time, duration, and magnitude of all exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

b) Scrubber inlet temperature

1) The permittee shall monitor the scrubber inlet temperature continuously with a temperature indicator which shall be installed as part of the pre-heat ring installation before the anode baking furnaces commence operation. The temperature shall be

recorded continuously whenever the emission unit is in operation. Temperature records shall be kept in accordance with Condition 22 – Records of Required Monitoring Information and Condition 26 – Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

2) The scrubber inlet temperature indicator and the pre-heat ring shall be operated in accordance with the operation and maintenance plan for the anode baking furnaces and scrubber. Records of any maintenance performed shall be kept in accordance with Condition 22 – Records of Required Monitoring Information and Condition 26 – Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

3) The scrubber inlet temperature shall be maintained above the temperature that would trigger scrubber bypass. The acceptable minimum scrubber inlet temperature must be approved by SRCAA no later than 90 days after the anode baking furnaces and scrubber commence operation and incorporated into the operation and maintenance plan for the anode baking furnaces and scrubber. If the scrubber inlet temperature is below the acceptable minimum temperature and the emission unit is in operation, an excursion has occurred, and the permittee shall notify maintenance personnel to inspect the equipment and take corrective action to return the equipment to normal operation (i.e., scrubber inlet temperature above acceptable minimum temperature and anode baking furnace exhausts not bypassing scrubber). If a scrubber bypass occurs, SRCAA shall be notified no later than 24 hours after the bypass. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all scrubber inlet temperature excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

4) The permittee shall report all scrubber inlet temperature excursions to SRCAA as part of the semiannual monitoring report, described in Condition 27. The report shall include the date, time, duration, and magnitude of all temperature excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

c) If the permittee identifies an exceedance of an emission limitations for which this MRRR condition was designed to monitor, but the MRRR condition did not provide an indication of an exceedance; or if testing results demonstrate that the indicator range given in this MRRR is not appropriate for monitoring compliance, the permittee shall notify SRCAA and initiate procedures to modify this permit.

[SRCAA Order 09-02 (VII), Condition 1 & 4, 7/6/09] [SRCAA Regulation I, Section 2.09, 2/7/08] [40 CFR Part 64, 7/1/01]

8M. When the boilers are in operation, the permittee shall perform emission testing on the

boilers, in accordance with Regulation I, Section 2.09, as follows:

a) No less than every 5 years, the permittee shall test the main boiler (8-33) for:
   i. Nitrogen oxides, using EPA Reference Method 7E and 19; and
   ii. Carbon monoxide, using EPA Reference Methods 10 and 19.

b) At the request of SRCAA, the permittee shall test the main boiler (8-33) and/or the standby boilers (8-32) for:
   i. Nitrogen oxides, using EPA Reference Method 7E and 19;
   ii. Carbon monoxide, using EPA Reference Methods 10 and 19;
   iii. Sulfur dioxide, using EPA Reference Methods in 40 CFR Part 60, Appendix A or B;
   iv. Volatile organic compounds, using EPA Reference Methods in 40 CFR Part 60, Appendix A or B;
   v. Particulate matter, using EPA Reference Method 5 (front half) or 17 (front half); and/or
   vi. Opacity, using EPA Reference Method 9 in 40 CFR 60 Part 60, Appendix A.

   [SRCAA Order 09-02 (III), Condition 1, 7/6/09]

9M. This condition applies to the following emission units:

- Boilers 1 & 2; standby boilers, each rated at 25.2 MMBtu/hr (8-32); and
- Boiler 3; main boiler, rated at 60 MMBtu/hr (8-33).

A boiler functional integrity inspection shall be conducted on a monthly basis when the equipment is in operation that, at a minimum, includes visual checks for the following: visible emissions, leaks in the ductwork and housing, excess vibration, and any boiler related performance monitoring devices, as appropriate. If visible emissions, leaks, excess vibration, and/or any abnormal performance monitoring device readings are observed at any time from the boiler, corrective action shall be initiated as soon as practical, but no later than 24 hours after the problem is observed. Records shall be kept of all inspections and corrective actions in accordance with Condition 26 – Retention of Records and upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [SRCAA Order 09-02 (III), Condition 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

10M. The permittee shall record the numbers of hours per month that each boiler operates. In addition, the permittee shall keep records of the amount of natural gas combusted in the main boiler during each calendar month. The hourly records shall be used to calculate the total annual NOx, CO, SO2, VOC, and PM emissions from all boilers combined, based on the most recent source test results or representative emission factors, if source test data is not available. Records shall be kept in accordance with Condition 26 – Retention of Records and upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [SRCAA Order 09-02 (III), Condition 3, 7/6/09] [40 CFR 60.48c(g)(2), 6/13/07] [WAC 173-400-115, 5/8/07] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

11M. The permittee shall measure and report, on an annual basis, the annual average pounds per hour of steam generated by the main boiler. [SRCAA Order 09-02 (III), Condition 4, 7/6/09]

12M. An inspection log of the brick crusher shall be maintained. When the brick crusher is in operation, inspections shall be conducted at least monthly by the permittee, on a form approved by SRCAA. [SRCAA Order 09-02 (I), Condition 3, 7/6/09]

13M. This condition shall function as Compliance Assurance Monitoring for the following emission units:

- Coke transfer baghouse 52NW (3-2);
- Coke transfer/screening & fines storage baghouse (3-4);
- Crushing/screening/transfer baghouse #53C (3-5);
- Crusher/transfer baghouse #80S (3-6);
- Green scrap & coke crusher/storage/transfer/batching, ball mill baghouse (3-7);
- Fresh coke airveyor dust collector (3-8);
- Reacted coke airveyor dust collector (3-9);
- Airveyor dust collector (3-15);
- North anode cleaner baghouse (4-2);
- South anode cleaner baghouse (4-3);
- Spencer system (coke separator) baghouses (4-4);
- Ore super dump super cleaning baghouses (8-1);
- Railcar unloading / south hopper, fresh ore storage / transfer baghouse #480 (8-4);
- Ore storage/transfer baghouse #477 (8-6);
- Ore storage, airlift/slides baghouse #475 (8-7);
- Ore north hopper, “A” belt baghouse #490 (8-8);
- Ore screening dust collector (8-10); and
- Bath crushing dust collector (8-13).

a) Visible Emissions:

The permittee shall meet the requirements given in a) 1) and if triggered, the permittee shall meet the requirements given in a) 2), a) 3), and a) 4).

1) The permittee shall perform daily inspections during daylight hours of all emission units subject to Condition 13M, while the emission units are operating, for the purpose of observing points of visible emissions and PM emissions from the emission units. The inspections shall be conducted as follows:

   i) each inspection shall be conducted from a location(s) with a clear view of the emission unit exhaust where the sun is not directly in the observer’s eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the exhaust;

   ii) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by

background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);

iii) each inspection shall consist of a minimum 15-second visual observation of each emission unit; and

iv) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance with Condition 26- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any of the emission units, no additional action is required. If visible emissions are observed from any of the emission units, the permittee shall take further action according to 2).

2) If visible emissions are observed from any of the emission units subject to Condition 13M, an excursion has occurred, and the permittee must verify that all equipment is performing its normal, designed function and is being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated as soon as possible, but within 24 hours of discovery of the problem. The goal of the corrective action taken shall be to eliminate visible emissions as soon as possible and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 30- Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 28-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the corrective action taken results in a return to conditions under which visible emissions are not observable, no further corrective action is required. If visible emissions are still observed, the permittee shall take further action according to 3).

3) If after corrective action is taken, visible emissions are still observed, the permittee shall perform, or have performed, EPA Method 9, Ecology Method 9A, and/or EPA Method 5 on the emission unit. The EPA Method 9, Ecology Method 9A, and/or EPA Method 5 tests shall occur as soon as possible, but no later than 30 days after the subsequent observation of visible emissions, unless SRCAA approves an alternate timeframe. Records of all EPA Method 9, Ecology Method 9A, and EPA Method 5 tests performed shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

i) If the visible emissions, as determined by EPA Method 9 or Ecology Method 9A, do not exceed any applicable opacity standards, and the particulate emissions, as determined by EPA Method 5, do not exceed any applicable particulate standards, no further corrective action is required.

ii) If a violation of any applicable opacity, and/or a violation of any applicable particulate standard, an exceedance has occurred, and appropriate corrective action shall be initiated as soon as possible, but no later than 24 hours after discovery of the violation, to identify and correct the problem causing the exceedance. The goal of the corrective action taken shall be to achieve compliance with the opacity and particulate standards as soon as possible and to prevent recurrence of the problem. Once corrective action has been taken to address the problem, the permittee shall perform, or have performed, EPA Method 9 or Ecology Method 9A (i.e., if an opacity exceedance occurred) and/or EPA Method 5 (i.e., if a particulate exceedance occurred) on the source of the emissions to demonstrate compliance with the opacity and/or particulate standards. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations. Records of all EPA Method 9, Ecology Method 9A, and EPA Method 5 tests performed shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

4) The permittee shall report all opacity excursions and opacity and/or particulate matter exceedances to SRCAA as part of the semiannual monitoring report, described in Condition 27. The report shall include the date, time, duration, and magnitude of all excursions and exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

b) Baghouse Pressure Drop:

For emission units with controlled potential particulate emissions over 5 tons per year, the permittee shall meet the requirements given in b) 1)-4). Emission units with controlled potential particulate emissions over 5 tons per year include the following:

- Coke transfer baghouse 52NW (3-2);
- Coke transfer/screening & fines storage baghouse (3-4);
- Crushing/screening/transfer baghouse #53C (3-5);
- Crusher/transfer baghouse #80S (3-6);
- Green scrap & coke crusher/storage/transfer/batching, ball mill baghouse (3-7);
- Spencer system (coke separator) baghouses (4-4);
- Ore super dump super cleaning baghouses (8-1);
- Railcar unloading / south hopper, fresh ore storage / transfer baghouse #480 (8-4);
- Ore north hopper, “A” belt baghouse #490 (8-8);
- Ore screening dust collector (8-10); and
- Bath crushing dust collector (8-13).

1) The permittee shall monitor the pressure drop across each baghouse / dust collector continuously with a differential pressure gauge whenever the emission unit is in operation. At least once every day that the emission unit is operated, the instantaneous pressure drop across each baghouse / dust collector must be recorded. Daily pressure drop records shall be kept in accordance with Condition 22-Records of Required

Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

2) Each baghouse / dust collector differential pressure gauge must be calibrated annually, in accordance with the manufacturer recommended procedures. Records of each calibration shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

3) The pressure drop across each baghouse / dust collector shall be maintained within the range recommended by the manufacturer, or an alternate range approved by SRCAA. The acceptable pressure drop range for each baghouse / dust collector must be approved by SRCAA no later than 90 days after each baghouse / dust collector commences operation and incorporated into the operation and maintenance plan for each baghouse / dust collector. If the pressure drop from any baghouse or dust collector is outside of the acceptable range, an excursion has occurred, and the permittee shall notify maintenance personnel to inspect the baghouse / dust collector and take corrective action to return the equipment to normal operation (i.e., pressure drop brought within acceptable range). Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition 28-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all pressure drop excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition 22- Records of Required Monitoring Information and Condition 26-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

4) The permittee shall report all pressure drop excursions to SRCAA as part of the semiannual monitoring report, described in Condition 27. The report shall include the date, time, duration, and magnitude of all pressure drop excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

c) If the permittee identifies an excursion or exceedance of an emission limitation for which this MRRR condition was designed to monitor but the MRRR condition did not provide an indication of an excursion or exceedance; or if testing results demonstrate that the indicator ranges given in this MRRR condition are not appropriate ranges for monitoring compliance, the permittee shall notify SRCAA and initiate procedures to modify this permit.

[40 CFR Part 64, 7/1/01]

III. PERMIT SHIELD

A. INAPPLICABLE REQUIREMENTS

The requirements listed in this section do not apply to the source, or to the specific emission units specified below, provided that such applicable requirements are included in and specifically identified in the permit. The permit shield applies to all requirements so identified. Citations to requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA. [WAC 173-401-640(2), 10/4/93]

Table III.A-1 - Inapplicable Requirements

Regulatory Citation	Reason for Inapplicability
40 CFR 60, Subpart S - Standards of Performance for Primary Aluminum Plants [10/17/00]	CDC Mead does not perform primary aluminum activities
RCW 70.94.610 - Burning Used Oil Fuel in Land-Based Facilities [1991]	The facility does not burn used oil
WAC 173-400-050(2) - Emission Standards for Incinerators [1/10/05]	The facility does not operate any incinerators, as defined in WAC 173-400-030
WAC 173-400-120 - Bubble Rules [1/10/05]	CDC Mead has not applied for a bubble.
WAC 173-400-131 - Issuance of Emission Reduction Credits [1/10/05]	CDC Mead has not applied for emission reduction credits
WAC 173-400-151 - Retrofit Requirements for Visibility Protection [1/10/05]	The facility has not been determined to cause or contribute to a visibility impairment.
Chapter 173-421 WAC - Emission Control Systems [9/16/87]	The facility does not perform work on motor vehicle emission systems.
Chapter 173-434 WAC - Solid Waste Incinerator Systems [12/22/03]	The facility does not operate a solid waste incinerator system, as defined in WAC 173-434-030
WAC 173-490-030 Registration and Reporting – Petroleum Liquid Storage Tanks [2/19/91]	The facility does not have any petroleum liquid storage tanks
WAC 173-490-040(2), (6), (7), (8), (9) & (10) - Petroleum Liquid Storage Tanks, Surface Coaters, Open Top Vapor Degreasers, Conveyorized Degreasers, Cutback Asphalt Paving & Cold Cleaners [2/19/91]	The facility does not operate any petroleum liquid storage tanks, surface coating operations, open top vapor degreasers, conveyorized degreasers, cutback asphalt paving operations, or cold cleaners.
WAC 173-490-201 - Petroleum Liquid Storage in External Floating Roof Tanks [2/19/91]	The facility does not have any petroleum liquid storage tanks
WAC 173-490-205 - Surface Coating of Miscellaneous Metal Parts and Products [2/19/91]	The facility does not engage in the surface coating of metal parts or products
Chapter 173-433 WAC - Solid Fuel Burning Devices [9/6/07]	The facility does not operate any solid fuel burning devices, as defined in WAC 173-433-030.