

**STATEMENT OF BASIS FOR
CDC MEAD, LLC
CHAPTER 401 AIR OPERATING PERMIT
AOP-19 RENEWAL #1**

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LIST OF ABBREVIATIONS

BACT	Best available control technology
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
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 called SCAPCA)
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS AND 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), 10/4/93]
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), 10/4/93]
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(22), 9/13/96]
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(23), 9/13/96]
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), 10/4/93]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 9/13/96]
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

**STATEMENT OF BASIS FOR CDC MEAD, LLC
CHAPTER 401 AIR OPERATING PERMIT
AOP-19 RENEWAL #1**

CDC Mead, LLC (CDC Mead), which was formerly a primary aluminum production facility owned and operated by Kaiser Aluminum & Chemical Corporation, Mead Works, owned and operated by Kaiser Aluminum – Mead, is located at 2111 E. Hawthorne Rd., Mead, WA. The facility was shut down in December 2000 and sold to Commercial Development Company (CDC) in June 2004. CDC Mead is classified as a producer of calcined coke and coal. The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to potential emissions of oxides of nitrogen (NO_x), particulate matter (PM₁₀), carbon monoxide (CO), and sulfur dioxide (SO₂) above the major source threshold of 100 tons per year. The facility is not classified as a major source of Hazardous Air Pollutants (HAPs) and therefore, is not subject to any MACT standards given in 40 CFR Part 63, including the primary or secondary aluminum MACT standards.

Air Operating Permit WA0000876 was issued by Washington Department of Ecology (WDOE) – Industrial Section to Kaiser Mead on February 26, 2004 with an expiration date of March 1, 2009. On March 1, 2006, regulatory oversight for air quality was transferred from the WDOE to the Spokane Regional Clean Air Agency (SRCAA) for the CDC Mead facility because the facility was no longer operationally capable of being a primary aluminum production facility (i.e., all of the potlines and associated equipment have been demolished and/or removed from the facility). As a result, SRCAA is the agency responsible for issuance of the renewal AOP to CDC Mead.

Many of the emission units that were included as part of Air Operating Permit WA0000876, issued by WDOE, are not included as part of the renewal AOP issued by SRCAA to CDC Mead because a significant amount of equipment has been demolished and/or removed from the facility, including:

- Equipment associated with the coke calcining process has been sold;
- Equipment associated with the potroom dust collection systems and potroom operations have been demolished; and
- Equipment associated with the anode rodding and the metal products process areas will be demolished and/or removed from the facility.

Equipment associated with the green carbon, baked carbon, ancillary operations, and maintenance areas remain on-site. All of the emission units are currently not in operation. However, CDC Mead has elected to maintain their Air Operating Permit such that the emission units could be operated again in the future without going through new source permitting.

As a major source, CDC Mead is required to apply for an operating permit under SRCAA's air operating permit program as established in Chapter 173-401 WAC and Title V of the Federal Clean Air Act. WAC 173-401-700(8) requires that at the time a draft permit is issued under the Title V program, a statement be provided, setting forth the legal and factual basis for permit conditions including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis

for the draft permit for CDC Mead.

The permit is organized into sections. The first section contains standard terms and conditions. This section is basically the same for all permits issued by SRCAA. The second section contains applicable requirements for the facility, along with monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emission units or classes of emission units. The third and final section addresses requirements that have been deemed inapplicable to the source or to emission units located at the source, i.e., the permit shield per WAC 173-401-640(2).

After a brief summary of operations at the facility, the format of this Statement of Basis will follow that of the permit with the standard terms and conditions discussed first, followed by the applicable requirements, and finally the permit shield.

FACILITY SUMMARY

CDC Mead currently has the operational capability to manufacture carbon anodes, which are sacrificially consumed in the aluminum electrolytic smelting process. CDC Mead has the capability to manufacture 228,000 tons of anodes per year, which requires 18 million pounds per month of calcined petroleum coke and coal tar pitch. The facility can be divided into four main areas: green carbon area, baked carbon area, ancillary operations area, and maintenance area.

The green carbon area, located in Buildings 52 & 54 and Area 200, produces unbaked (green) anodes. Calcined petroleum coke (unloaded and transferred from Building 52) and used anodes (spent butts) are crushed, sized, and stored according to desired specifications. Batches consisting of the sized coke aggregate are combined with coal tar pitch (unloaded and transferred from Area 200) and mixed to form a paste. The anode paste is then pressed to form green anodes in Building 54. The green anodes are then sent to the baked carbon area.

The baked carbon area, located in Buildings 53, 55, 59B, and 300, bakes the green carbon anodes. A new carbon baking furnace was installed at the facility in 1998. The anodes are baked in an inert atmosphere in below-ground furnaces to temperatures of ~ 1,050° C for approximately 16 days in Buildings 53 & 300. After cooling, the anodes are removed from the furnaces and conveyed to cleaning machines where all excess material is removed from their surfaces in Buildings 55 and 59B. The baking process calcines the anodes, removes volatile substances, and develops electrical conductivity properties, resulting in a monolithic carbon mass (baked anode) for use in the smelter industry.

The ancillary operations area, located in Buildings 32A, 32F, 36, 40B, 41, 58E, and 66D, includes the analytical laboratory (Buildings 40B, 41, and 58E), ore loading and screening (Building 32A and 36), waste handling, and boilers (Building 66D). The boilers formerly had the capability to burn fuel oil #2 as back up fuel. However, CDC Mead has clean-closed the #2 fuel oil tanks for the boilers, so the three boilers will be operating solely on natural gas.

The maintenance area, located in Buildings 10, 15, 34, 43, 44, 45, 46, 46A, 50, 51, 56A, 62, 63, 66B, 66C, 66M, 85, and 110, includes all plant maintenance that is not included

within the work areas of the production processes, including shop equipment and air compressors.

PERMITTING HISTORY

Washington Department of Ecology – Industrial Section issued thirty Notices of Construction (NOC) to the Kaiser Mead facility between 1988 and 2001. On February 26, 2004, WDOE issued Ecology Consolidated Order No. DE 01 AQIS-2005 to the facility to compile all applicable requirements from the thirty pre-existing NOCs into one document.

In November 2008, CDC Mead requested that SRCAA revise WDOE Order No. DE 01 AQIS-2005 to reflect the emission units at the current facility and to revise the order applicable to the boilers to remove the provisions for burning #2 fuel oil because the boilers only have the capability to burn natural gas. SRCAA issued the revised Consolidated Order, SRCAA Order #08-02 (issued as a SRCAA Order because SRCAA is now the agency with regulatory oversight for air quality), on {insert date}. Upon issuance, SRCAA Order 02-02 effectively replaced Ecology Order No. DE 01 AQIS-2005. The revised Consolidated Order, SRCAA Order #08-02, includes the following WDOE Orders that are still applicable to the CDC Mead facility:

- I. ORDER No. DE-I156 and First Amendment Aggregate Recycling Plant [Issued pursuant to RCW 70.94.152 and WAC 173-403-050]
- II. ORDER No. DE 91 AQ – I074 Replacement of 475/477 Dust Collectors [Issued pursuant to RCW 70.94.152 and WAC 173-400-110]
- III. ORDER No. DE 92 AQ-I025 and First Amendment Boiler Replacement [Issued pursuant to RCW 70.94.152 and WAC 173-400-110]
- IV. ORDER No. DE 93 AQ – I077 Green Carbon Vacuum System [Issued pursuant to RCW 70.94.152 and WAC 173-400-110]
- V. ORDER No. DE 94 AQ – I019 Coke Unloading Dust Collector [Issued pursuant to RCW 70.94.152 and WAC 173-400-110]
- VI. ORDER No. DE 94 AQ – I083 Central Plenum Dust Collector [Issued pursuant to RCW 70.94.153 and WAC 173-400-110]
- VII. ORDER No. DE 96 AQ – I071 Anode Baking Modernization [Issued pursuant to RCW 70.94.152 and WAC 173-400-112 and -113]
- VIII. ORDER No. DE 96 AQ – I073 Replace 480 Dust Collector [Issued pursuant to RCW 70.94.153 and WAC 173-400-114]

Air Operating Permit WA0000876 was issued by WDOE – Industrial Section to Kaiser Mead on February 26, 2004, with an expiration date of March 1, 2009.

On March 1, 2006, regulatory oversight for air quality was transferred from WDOE to SRCAA for the CDC Mead facility.

COMPLIANCE HISTORY

SRCAA has performed a compliance inspection at CDC Mead annually at CDC Mead since 2006. However, since the facility has been shut down since December 2000 (except for limited operation of an aluminum shot casting furnace), the inspections have been limited to a facility tour.

Since 2006, SRCAA has issued one Notice of Violation to CDC Mead. NOV #7601 was issued to CDC Mead on June 22, 2007 for: not providing and maintaining easily visible labels posted at the shot casting furnace (group 2 furnace) which identifies the applicable emission limits and means of compliance during 2006, failure to submit semiannual excess emissions/summary reports and startup, shutdown, and malfunction reports for the secondary aluminum processing unit (shot casting furnace) during 2006, failure to identify deviations from permit requirements in monthly monitoring reports during 2006, failure to submit deviation reports during 2006, and failure to submit an annual compliance certification to SRCAA or Ecology covering calendar year 2005, due in 2006. Per CDC Mead, the aluminum shot casting furnace is no longer in use at CDC Mead and therefore, is not included under this AOP.

EMISSION UNITS

All emission units and activities at CDC Mead, which are done in support of this function, are part of the major source, which throughout this document is referred to as "CDC Mead".

Emission units at CDC Mead can be broken into four main categories: green carbon sources, baked carbon sources, ancillary operations, and maintenance operations. Table 1 lists all of the significant emission units at CDC Mead. The emission units given in Table 1 are all subject to the facility-wide emission limitations given in Section A. of the permit.

Table 1 – CDC Mead Significant Emission Units

Description	Process / ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Coke Unloading	Green Carbon / 3-1	N/A	Baghouse (4,200 dscfm)
Coke Transfer (Building 52 to Building 54)	Green Carbon / 3-2	N/A	Baghouse (19,000 dscfm)
Fines Storage, Coke Screening, Crushing, Transfer, Storage (Bldg. 54)	Green Carbon / 3-4	N/A	Dust collector (20,000 dscfm)
Butt crusher, transfer	Green Carbon / 3-5	N/A	Baghouse #53C (12,492 dscfm)
Butt Crushing, Screening, Transfer, Storage (Building 54)	Green Carbon / 3-6	N/A	Baghouse #80S (20,000 dscfm)
Green Scrap Crushing, Screening, Storage, Batching, Lower Coke Transfer (Building 54)	Green Carbon / 3-7	N/A	Baghouse (32,000 dscfm)
Fresh Coke Airveyor	Green Carbon / 3-8	N/A	Dust collector (700 dscfm)
Reacted Coke Airveyor	Green Carbon / 3-9	N/A	Dust collector (700 dscfm)
Green Carbon Vacuum System	Green Carbon / 3-10	N/A	Baghouse (2,912 dscfm)
Anode paste scrubber	Green Carbon / 3-14	N/A	Scrubber (37,809 dscfm)
Dust Airveyor	Green Carbon / 3-15	N/A	Dust collector (700 dscfm)

Description	Process / ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Two anode baking furnaces buildings 300 & 53	Baked Carbon / 4-1	Natural gas	Scrubber (78,000 dscfm)
North anode cleaner	Baked Carbon / 4-2	N/A	Baghouse (6,360 dscfm)
South anode cleaner	Baked Carbon / 4-3	N/A	Baghouse (8,400 dscfm)
Coke separator	Baked Carbon / 4-4	N/A	Baghouse (11,000 dscfm)
Ore Super Cleaning / Super Dump (Building 36)	Ancillary Operations / 8-1	N/A	Baghouses 1 & 2 (38,550 dscfm)
Railcar unloading, South Hopper, Fresh Ore Tank 119 (Building 36)	Ancillary Operations / 8-4	N/A	Baghouse #480 (23,262 dscfm)
Tank 191, Airlifts/Airslides, Fresh Ore Tank 119	Ancillary Operations / 8-6	N/A	Baghouse #477 (5,663 dscfm)
Reacted Ore Tank 121, Airlifts/Airslides	Ancillary Operations / 8-7	N/A	Baghouse #475 (6,359 dscfm)
Ore north hopper, "A" belt	Ancillary Operations / 8-8	N/A	Baghouse #490 (3,100 dscfm)
Ore screening	Ancillary Operations / 8-10	N/A	Dust collector (10,500 dscfm)
Bath crushing	Ancillary Operations / 8-13	N/A	Dust collector (19,000 dscfm)
Boilers 1 & 2; standby boilers, each rated at 25.2 MMBtu/hr	Ancillary Operations / 8-32	Natural gas	None
Boiler 3; main boiler, rated at 60 MMBtu/hr	Ancillary Operations / 8-33	Natural gas	None
Mead-crete brick crusher	Maintenance Operations / 9-5	N/A	None
Masonry saw (Bldg 61)	Maintenance Operations / 9-7	N/A	Baghouse (1,054 dscfm)

Some of the emission units at CDC Mead have additional requirements that apply to them, in addition to the facility-wide requirements. These additional requirements include Notice of Construction conditions and New Source Performance Standard requirements. A section on the emission units with additional requirements follows, with emission units divided into four main categories: green carbon sources, baked carbon sources, ancillary operations, and maintenance operations. If a unit has gone through the NOC process, the NOC approval number is given after the unit description.

Green Carbon Area Sources

The green carbon area, located in Buildings 52 & 54 and Area 200, produces unbaked (green) anodes. Calcined petroleum coke (unloaded and transferred from Building 52) and used anodes (spent butts) are crushed, sized, and stored according to desired specifications. Batches consisting of the sized coke aggregate are combined with coal tar pitch (unloaded and transferred from Area 200) and mixed to form a paste. The anode paste is then pressed to form green anodes in Building 54. The green anodes are then sent to the baked carbon area. Significant emission units from the green carbon area that have additional requirements beyond the facility-wide requirements are given in Table 2.

Table 2 – Green Carbon Area Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Coke Unloading (52NW) – SRCAA Order 08-02 (V)	3-1	None	Baghouse (4,160 dscfm)
Green carbon scrap & coke crushing / storage / transfer / batching / ball mill – SRCAA Order 08-02 (VI)	3-7	None	Baghouse (32,000 dscfm)
Green carbon vacuum system – SRCAA Order 08-02 (IV)	3-10	None	Baghouse (2,000 dscfm)

Baked Carbon Area Sources

The baked carbon area, located in Buildings 53, 55, 59B, and 300, bakes the green carbon anodes. The anodes are baked in an inert atmosphere in below-ground furnaces to temperatures of ~ 1,050° C for approximately 16 days in Buildings 53 & 300. After cooling, the anodes are removed from the furnaces and conveyed to cleaning machines where all excess material is removed from their surfaces in Buildings 55 and 59B. The baking process calcines the anodes, removes volatile substances, and develops electrical conductivity properties, resulting in a monolithic carbon mass (baked anode) for use in the smelter industry. Significant emission units from the baked carbon area that have additional requirements beyond the facility-wide requirements are given in Table 3.

Table 3 - 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 08-02 (VII)	4-1	Natural Gas	Scrubber (78,000 dscfm)
North Anode Cleaner – SRCAA Order 08-02 (VII)	4-2	None	Baghouse (6,360 dscfm)
South Anode Cleaner – SRCAA Order 08-02 (VII)	4-3	None	Baghouse (8,400 dscfm)

Ancillary Operations

The ancillary operations area, located in Buildings 32A, 32F, 36, 40B, 41, 58E, and 66D, includes the analytical laboratory (Buildings 40B, 41, and 58E), ore loading and screening (Building 32A and 36), waste handling, and three boilers (Building 66D). Boilers 1 & 2 are standby boilers that were constructed prior to June 9, 1989 and have not been modified or reconstructed. Therefore, Boilers 1 & 2 are not subject to 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Boiler 3 is the main boiler and was constructed after June 9,

1989 and is therefore, subject to the requirements of 40 CFR 60, Subpart Dc. All three boilers originally burned fuel oil #2 as back-up fuel. However, currently, the three boilers now burn exclusively pipeline quality natural gas. Significant emission units from the ancillary operation area that have additional requirements beyond the facility-wide requirements are given in Table 4.

Table 4 – 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 08-02 (VIII)	8-4	None	Baghouse #480 (23,262 dscfm)
Ore storage / transfer – SRCAA Order 08-02 (II)	8-6	None	Baghouse #477 (5,633 dscfm)
Ore storage airlift / slides – SRCAA Order 08-02 (II)	8-7	None	Baghouse #475 (6,359 dscfm)
Boilers 1 & 2; standby boilers, each rated at 25.2 MMBtu/hr – SRCAA Order 08-02 (III)	8-32	Natural Gas	None
Boiler 3; main boiler, rated at 60 MMBtu/hr – SRCAA Order 08-02 (III)	8-33	Natural Gas	None

Maintenance Operations

The maintenance area, located in Buildings 10, 15, 34, 43, 44, 45, 46, 46A, 50, 51, 56A, 62, 63, 66B, 66C, 66M, 85, and 110, includes all plant maintenance that is not included within the work areas of the production processes, including shop equipment and air compressors. Significant emission units from the ancillary operation area that have additional requirements beyond the facility-wide requirements are given in Table 5. The brick crusher was permitted in 1989 and installed after 1989, so it is subject to the requirements given in 40 CFR 60, Subpart OOO, “Standards of Performance for Nonmetallic Mineral Processing Plants” (applicability date for Subpart OOO is August 31, 1983).

Table 5 – Maintenance Operations Emission Units

Description	ID Number Used in Permit Application	Fuels Used	Air Pollution Control Equipment
Brick crusher – SRCAA Order 08-02 (I)	9-5	None	None

Insignificant Emission Units

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 8. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the State Implementation Plan (SIP). SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 6 to assure compliance with the generally applicable requirements. SRCAA’s determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirement in the past from the list of IEUs in Table 6 (i.e., the IEUs have had a consistent compliance history);
- Most of the IEUs emit small quantities of pollutants and/or do not operate continuously; and
- The majority of the IEUs are emission units or activities that are not directly vented (i.e., do not have an exhaust stack).

Table 6 – Insignificant Emission Units

Emission Unit Description	Process Number	Basis / Justification for IEU Designation
General plant upkeep, repair, and routine maintenance (including painting, paving, etc.)	1 – Facility-wide activities	WAC 173-401-532(33) WAC 173-401-532(74)
Cleaning and sweeping of streets and paved areas	1 – Facility-wide activities	WAC 173-401-532(35)
General building vents – air conditioning or air cooling	1 – Facility-wide activities	WAC 173-401-532(46)
Office activities	1 – Facility-wide activities	WAC 173-401-532(49)
Vents from shower and bathroom facilities	1 – Facility-wide activities	WAC 173-401-532(48)
Infirmary activities	1 – Facility-wide activities	WAC 173-401-532(53)
Fuel and exhaust emissions from vehicles in parking lots	1 – Facility-wide activities	WAC 173-401-532(54)
Solid waste containers	1 – Facility-wide activities	WAC 173-401-532(79)
Lawn and landscaping activities	1 – Facility-wide activities	WAC 173-401-532(43)

Fire fighting equipment, fire training equipment, fire training	1 – Facility-wide activities	WAC 173-401-532(52)
Internal combustion engines for propelling or powering a vehicle.	1 – Facility-wide activities	WAC 173-401-532(10)
Sampling connections used to withdraw samples for laboratory analysis	1 – Facility-wide activities	WAC 173-401-532(51)
Activities generating only fugitive emissions, including vehicle movement on streets and paved surfaces	1 – Facility-wide activities	WAC 173-401-530(1)(d)
Welding activities plant-wide that consume < 1 tons of welding rod per day, including bottled welding gas storage	1 – Facility-wide activities 8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-532(5) WAC 173-401-532(12) WAC 173-401-533(2)(i)
Small gas-fired area heaters, < 5 MMBtu/hr	1 – Facility-wide activities	WAC 173-401-533(2)(e)
Vents from rooms, buildings, and enclosures that contain permitted emissions units or activities from which local ventilation, controls and separate exhaust are provided	3 – Green carbon 4 – Baked carbon 8 – Ancillary operations 9 – Miscellaneous operations	WAC 173-401-532(9)
Maintenance and housekeeping	3 – Green carbon 4 – Baked carbon 8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-532(33) WAC 173-401-532(74)
Activities generating only fugitive emissions	3 – Green carbon 4 – Baked carbon 8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-530(1)(d)
Safety relief valves	3 – Green carbon 8 – Ancillary operations	WAC 173-401-532(87)
Gas-fired heaters < 5 MMBtu/hr	3 – Green carbon 8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-533(2)(e)
Housekeeping vacuum system	3 – Green carbon	WAC 173-401-532(108)
Storage of solid material, dust-free handling	4 – Baked carbon	WAC 173-401-532(6)

Emergency vent	4 – Baked carbon	WAC 173-401-532(87)
Vacuum system exhaust	8 – Ancillary operations	WAC 173-401-532(108)
Totally enclosed conveyors	8 – Ancillary operations	WAC 173-401-532(86)
Covered storage tanks with no generation of objectionable odor or airborne particulate matter	8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-532(4)
Molten metal holding equipment (no HAPs)	8 – Ancillary operations	WAC 173-401-532(21)
Shot blasting performed indoors with particulate emission control in immediate vicinity and inside exhaust	8- Ancillary operations	WAC 173-401-532(55)
Storage of solid material, dust-free handling, and portable drums or totes	8 – Ancillary operations 9 – Maintenance operations	WAC 173-401-532(6) WAC 173-401-532(42)
Clean condensate tanks	8 – Ancillary operations	WAC 173-401-532(96)
Sewage treatment plant of < 1 million gallons per day	8 – Ancillary operations	WAC 173-401-533(2)(bb)
Sample preparation and management	8 – Ancillary operations	WAC 173-401-532(73)
Electric or steam heated drying ovens	8 – Ancillary operations	WAC 173-401-532(119)
Lab pilot plant	8 – Ancillary operations	WAC 173-401-533(3)(a)
Covered tank for storage of aqueous solutions of inorganic salts	8 – Ancillary operations	WAC 173-401-533(2)(s)
Pneumatically operated equipment	8 – Ancillary operations	WAC 173-401-532(88)
Covered diesel storage tanks	8 – Ancillary operations	WAC 173-401-533(2)(t)
Natural draft stacks, with discharge of < 5 tons/yr of a regulated pollutant not listed in WAC 173-401-530(4) or 173-401-531	8 – Ancillary operations	WAC 173-401-530(4)(q) WAC 173-401-532(47)
Cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, and shot blasting metals	9 – Maintenance operations	WAC 173-401-532(55)
Air compressors, pneumatic equipment and tools	9 – Maintenance operations	WAC 173-401-532(88)

General vehicle maintenance including vehicle exhaust	9 – Maintenance operations	WAC 173-401-532(7) WAC 173-401-532(45)
Operation, loading, and unloading of propane storage tanks < 40,000 gallons	9 – Maintenance operations	WAC 173-401-533(2)(d)
Non-PCB transformers	9 – Maintenance operations	WAC 173-401-532(118)
Battery back-up power	9 – Maintenance operations	WAC 173-401-532(77)
Operation, loading, and unloading of gasoline and diesel storage tanks < 10,000 gallon capacity	9 – Maintenance operations	WAC 173-401-533(2)(c)
Lubricating oil storage tanks	9 – Maintenance operations	WAC 173-401-532(3)
Discharge of less than 0.5 tons/yr of a regulated pollutant not listed in WAC 173-401-530(4) or 173-401-531	9 – Maintenance operations	WAC 173-401-530(4)(q)

It should be noted that the following emission units were listed as IEUs in the Air Operating Permit application, submitted by CDC Mead, but were not included in the table above as IEUs, for the following reasons:

Building & structure modification, construction, and demolition activities: This emission unit cannot be considered an insignificant emission unit because SRCAA Regulation I, Article IX applies to renovation and demolition activities in Spokane County.

Internal combustion engines: This broad category cannot be considered an insignificant emission unit because SRCAA Regulation I, Article V requires a Notice of Construction prior to installation of certain internal combustion engines. Per WAC 173-401-532(10), internal combustion engines for propelling or powering a vehicle can be considered an insignificant emission unit and therefore, is included in Table 6 above.

STANDARD TERMS AND CONDITIONS

This section of CDC Mead’s permit contains standard terms and conditions that apply to all sources in SRCAA’s Title V program. These conditions have been reviewed by EPA and include all terms required in Chapter 173-401 WAC as well as requirements from other applicable air quality laws and regulations. The standard terms have been organized in seven subsections including:

- PERMIT ADMINISTRATION;
- INSPECTION & ENTRY;
- EMERGENCY PROVISIONS;
- GENERAL MONITORING, RECORDKEEPING, & REPORTING;
- COMPLIANCE CERTIFICATION;

TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND
TREATMENT OF DOCUMENTS; and
APPLICABLE WHEN TRIGGERED REQUIREMENTS.

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, 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. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the permit, the terms based on Chapter 173-401 WAC will become federally enforceable for the source.

NOTE: The filing or promulgation date for each requirement is also given. This date may be important if an earlier version of the requirement is in the SIP. In many instances, a revision may have occurred within a section that does not affect the requirement being cited. If this is the case, the most recent filing or promulgation date is given, along with the SIP version date in parentheses, and the requirement is federally enforceable. If a change was made in the requirement, both the earlier, SIP approved, requirement and the most recent requirement would be included in the permit. The version in the SIP would be federally enforceable, and the more recent version would be enforceable at the state or local level.

If a new rule or a newer version of a rule has been submitted to EPA for inclusion in the SIP and EPA has proposed action, but not taken final action, the permit will be drafted so that when EPA action does occur, the requirement will become federally enforceable.

Permit Administration

Below are standard terms included in the subsection, Permit Administration. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

1. Federal Enforceability - All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]
2. Duty to Comply - The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]
3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 10/4/93]
4. Need to Halt or Reduce Activity Not a Defense - The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]
5. Permit Actions - This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If CDC Mead files a request to modify,

revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-620(2)(c), 10/4/93]

6. Reopening for Cause. This term lists instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]

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

8. Property Rights. The 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 must furnish, within a reasonable time to SRCAA, any information, including records required in the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. [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, must promptly submit such supplementary facts or corrected information. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit. [WAC 173-401-500(6), 9/16/02]

11. Permit Fees. The permittee must pay fees as a condition of this permit in accordance with SRCAA's fee schedule. [WAC 173-401-620(2)(f), 10/4/93]

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

13. Permit Appeals. The 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. The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted.

Chapter 173-401-710(1) allows SRCAA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SRCAA specifies in the permit that the renewal must be submitted no more than 18 months and no less than 12 months prior to the permit expiration. The facility may continue to operate subject to final action by SRCAA on the application, as long as a timely and complete application has been filed and all requested additional information necessary to process the permit is submitted by the deadline specified in writing by SRCAA. [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. The permit will not expire 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 identified in the permit upon which that condition is based, as of the date of permit issuance except that this shield will not 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]

Inspection and Entry

Below are standard terms included in the subsection, Inspection & Entry. This subsection of the permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

17. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee must allow SRCAA, or an authorized representative, to enter a Chapter 401 facility or location where records are kept, to have access to and copy, at reasonable times records, to inspect, at reasonable times, any facility or equipment or operations regulated by the permit, and/or to perform sampling or monitoring, at reasonable times, for the purpose of assuring compliance. [WAC 173-401-630(2), 10/4/93]

Nothing in this condition limits 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 may obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor may any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1987 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.02E, 1/7/02 – STATE/LOCAL ONLY]

Emergency Provisions

Below are standard terms that are included in the subsection, Emergency Provisions. This subsection of the permit contains provisions, governing the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

19. Emergencies. This term incorporates the emergency provisions established in Chapter 173-401 WAC which allow for a positive defense to noncompliance with technology-based emission limitations if certain conditions are met. The time limits for reporting such emission events are included to assure that the permittee is aware of the timeframes. The time limits come from WAC 173-401-645 and WAC 173-401-615(3)(b). [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

20. Excess Emissions. This term incorporates the excess emissions provisions of Chapter 173-400 WAC which require that the excess emissions be excused and not be subject to penalty if certain criteria are met. As with the emergency provision above, the time limits for reporting excess emissions are included in this term. [WAC 173-400-107, 8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

21. Report of Breakdown. This term establishes the conditions under which violations of SRCAA Regulation I may be excused. It should be noted that this provision cannot be invoked for any federally enforceable requirement, as Section 6.08 is not in the State Implementation Plan. [SRCAA Regulation I, Section 6.08, 3/4/04 - STATE/LOCAL ONLY]

General Monitoring, Recordkeeping, & Reporting

Below are standard terms included in the subsection, General Monitoring, Recordkeeping, & Reporting. This subsection contains general requirements for monitoring, recordkeeping, and reporting. Monitoring, recordkeeping, & reporting requirements (MRRR) that apply to specific emission standards or specific emission activities are located in the second section of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the terms, Monitoring Reports and Data Recovery, attempts have been made to clarify SRCAA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

22. Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

23. Permanent Shutdown of an Emission Unit - If an emission unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emissions unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shut down emissions unit, generated while the emissions unit was in operation, must 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 must record the date that operation of the emissions unit ceased, using a log or file on site. The shutdown date must 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 emissions 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 lengths of time that, the emissions unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

25. Records of Changes. The permittee must 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 such a change. [WAC 173-401-615(2)(b), 9/16/02]

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

27. Monitoring Reports. The permittee must submit monitoring reports at least once every six months and such reports must identify all deviations from the permit requirements. The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data by telemetry or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

28. Prompt Reporting of Deviations. The permittee must promptly report deviations from permit requirements, the probable cause of such deviations, and any corrective measures taken. (Prompt is defined in this permit term and is consistent with the reporting time limits of terms in the **Emergency Provisions** section.) [WAC 173-401-615(3)(b), 9/16/02]

29. Emission Inventory. The permittee must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. [WAC 173-400-105(1), 5/8/07(8/20/93)]

30. WAC 173-401-530(1)(a) Insignificant Emission Units. Emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. [WAC 173-401-530(6), 9/16/02]

31. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

32. Rendering Device or Method Inaccurate. CDC Mead may 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]

Compliance Certification

As part of SRCAA's Title V program, sources are required to submit annual compliance certifications. (SRCAA may require more frequent certifications if the source is out of compliance or if an underlying requirement specifies more frequent submittals.) This subsection of the permit addresses the details of these compliance certification submittals, including how often submittals must occur, what the submittals must contain and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

33. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 10/4/93]

34. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 10/4/93]
[WAC 173-401-530(d), 9/16/02]

35. Submittal to EPA. This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 10/4/93]

Truth and Accuracy of Statements and Documents and Treatment of Documents

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and Documents and Treatment of Documents. The terms are based on SRCAA's Regulation I. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

36. False Information. CDC Mead may 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)]

37. Falsification of Statements. This term prohibits willfully making false statements to SRCAA in any matter within SRCAA's jurisdiction. [SRCAA Regulation I, 2.08.A, 8/3/06 - STATE/LOCAL ONLY]

38. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [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 must 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. Notices which SRCAA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA. [SRCAA Regulation I, 2.08.D, 8/3/06 - STATE/LOCAL ONLY]

Applicable When Triggered Requirements

The subsection, Applicable When Triggered Requirements, contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SRCAA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Source Testing, language has been added to clarify what an approved test method is, as the rule does not elaborate on what "approved" means. The discussion below provides more detail in regards to this.

41. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, -112, -113, 8/15/01 – 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 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 must 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 methods per WAC 173-400-050, -060, & -105(4). All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." Chapter 173-400 WAC does not elaborate on what "approved" means. Language has been added to this condition to clarify what SRCAA considers "approved". The condition requires that in order for a method to be approved it must be submitted to SRCAA at least 30 days prior to the test date, or a shorter period of time if indicated in writing by SRCAA, and SRCAA must approve the method in writing. Changes must also be approved by SRCAA in writing. [WAC 173-400-105(4), (8/20/93)] [WAC 173-400-105(4), (5/8/07) – STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 2/7/08]

45. Chemical Accident Prevention Provisions. The permittee must comply with the requirements given in 40 CFR Part 68 if they have more than a threshold quantity of a regulated substance in a process as determined under 40 CFR §68.130. CDC Mead has a 30,000 gallon propane tank at the facility. Propane is a regulated flammable substance with a threshold level of 10,000 gallons. Therefore, the accidental release prevention regulation in 40 CFR 68 applies to CDC Mead. [40 CFR Part 68, 1998]

EMISSION LIMITATIONS & MONITORING, RECORDKEEPING & REPORTING

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Subsequent subsections focus on individual emission units or classes of similar emission units. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are listed in columns. The actual requirement is given in the third column of the table. The regulatory 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 last column of the emission limitation tables.

The monitoring, recordkeeping, and reporting requirements (MRRR) are enforceable and are given in the last subsection of the permit. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying requirement.

For CDC Mead, this section contains six subsections:

FACILITY-WIDE EMISSION LIMITATIONS;
GREEN CARBON EMISSION LIMITATIONS;

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BAKED CARBON EMISSION LIMITATIONS;
ANCILLARY OPERATIONS EMISSION LIMITATIONS;
MAINTENANCE OPERATIONS EMISSION LIMITATIONS; and
MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS.

The subsections and their contents are discussed in detail below except that rather than listing all MRRR at the end, MRRR are discussed in context of the applicable requirement(s) to which they apply.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

Facility-wide Emission Limitations

This subsection contains applicable emission limitations which apply facility-wide. These emission limitations are applicable to all significant and insignificant emission units at the facility.

This subsection contains applicable emission limitations which apply facility-wide or that apply to very general classes, as indicated in the condition itself (e.g., process units or combustion units, etc...). The facility-wide emission limitations apply to insignificant emissions units. However, monitoring, recordkeeping and reporting requirements 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. CDC Mead is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 30).

The following requirements are included in this section.

Condition 46: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040. [WAC 173-400-040, 8/20/93] [WAC 173-400-040, 1/10/05 – STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 47: Visible emissions shall not exceed 20%, as specified in WAC 173-400-040. [WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05 (8/20/93)]

MRRR: CDC Mead is required to perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of potential visible emissions and PM emissions from the following emission points:

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

The list of emission points that CDC Mead is required to inspect weekly includes all of the significant emission units at the facility, except for those emission units that have periodic monitoring requirements for opacity and/or particulate matter emission standards specified in the underlying requirements (NOC approval orders) and those emissions units that are subject to the Compliance Assurance Monitoring (CAM) requirements given in 40 CFR Part 64. The CAM requirements require daily inspections. A discussion of the CAM requirements is given after the discussion of the weekly monitoring requirements.

For the emission units listed in the bulleted list above, 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).

- 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 1 working day 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.

Compliance Assurance Monitoring

The required monitoring was established for the purposes of Compliance Assurance Monitoring (CAM), authorized by 40 CFR Part 68, 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).

CAM must be designed to provide reasonable assurance of compliance with emission limitations or standards for a pollutant-specific emission unit (PSEU). In order for a PSEU to be subject to CAM, the three conditions described below must be met. The manner in which they are met by the emission units given in the bulleted list above for particulate matter is discussed below:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the emission units listed above, CDC Mead has estimated the pre-controlled PTE of particulate matter for each emission unit to be over the major source threshold of 100 tpy, established in WAC 173-401-200(17).

For emission units subject to CAM, if the post-controlled PTE is estimated to be more than 100 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled PTE of particulate matter from each of the emission units is estimated to be less than 100 tons per year, based on the estimate given in the CDC Mead AOP renewal application. Therefore, the emission units subject to CAM are not considered to be large emissions unit, since post-controlled emissions are less than 100 tons per year. Per 40 CFR 64.3(b)(iii), the frequency of data collection may be less frequent than 4 times per hour, but must include some type of data collection at least once per 24-hour period.

2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the emission units listed above, the particulate emissions from each emission unit is either controlled with a baghouse or a dust collector. It is not possible for the emission units to bypass the control equipment. Therefore, CAM does not need to address the potential for bypass.
3. The PSEU must be subject to an emission limit for the applicable

pollutant. In the case of the emission units listed in the bulleted list, each emission unit is subject to a 20% opacity limit given in Chapter 173-400 WAC (Condition 47) and SRCAA Regulation I, Section 6.02 (Condition 48), and a 0.1 gr/dscf grain loading limit given in WAC 173-400-060 (Condition 56). In addition, some of the emission units are subject to more stringent opacity and grain loading standards given in Notice of Construction approvals.

It should be noted that the baked carbon scrubber is not subject to the CAM requirements for opacity even though it meets the CAM applicability criteria (i.e., has pre-control PTE of over 100 tpy, utilizes air pollution control equipment and is subject to an opacity standard) because §64.2(b)(vi) exempts emission limitations which require the use of a continuous compliance demonstration method. Since the Notice of Construction for the baked carbon scrubber requires the use of a Continuous Opacity Monitor (COM), which is a continuous compliance demonstration method, the baked carbon scrubber is exempt from the CAM requirements for opacity.

The proposed CAM for the emission units in the bulleted list has been designed to rely on two performance indicators: visible emissions monitoring and pressure drop monitoring for emission units with controlled potential particulate emissions over 5 tons per year. Each of these is discussed in detail below:

Visible emissions (opacity) was selected as one of the performance indicators because it is indicative of good operation and maintenance of a baghouse or dust collector and because of the general correlation between particulate matter emissions and visible emissions (i.e., visible emissions are an indicator of particulate matter). When the baghouse or dust collector is operating optimally, there should be minimal visible emissions from the exhaust. In general, an increase in visible emissions indicates reduced performance of the baghouse or dust collector.

The selected indicator range is a no-visible-emissions standard. There is not an established relationship between particulate emissions and opacity for any of the emission units subject to the CAM requirements. However, the “no visible emissions” (a.k.a., “smoke / no smoke”) concept is acceptable monitoring for the particulate emission standard because SRCAA is of the opinion that something will be visible before a compliance problem exists. CDC Mead will be required to perform daily inspections during daylight hours, while the equipment is operating, for the purpose of monitoring the baghouse and dust collector exhausts for the presence of visible emissions. CDC Mead must keep records 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 no visible emissions

are observed from the emission units, no corrective action is required. If visible emissions are observed, the following actions shall be taken:

If visible emissions are observed from any of the emission units subject to the CAM requirements, 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 28-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 26-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 after corrective action is taken, visible emissions are still observed, the permittee shall perform, or have performed, EPA Method 9 or Ecology Method 9A on the emission unit. The Ecology Method 9 or Ecology Method 9A 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 for testing. Records of all Ecology Method 9 and Ecology Method 9A 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.

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

If a violation of any applicable opacity standard is documented, 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 on the source of the emissions to demonstrate compliance with the opacity 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 and Ecology Method 9A 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.

CDC Mead must report all opacity excursions and opacity 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.

In addition to the visible emissions monitoring, for emission units with controlled potential particulate emissions over 5 tons per year, CDC Mead is required to perform additional pressure drop monitoring. 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).

Baghouse pressure drop was selected as one of the performance indicators because operation within a specified pressure range is indicative of good operation and maintenance and provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop may indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, the bags are becoming blinded, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags; this may also be indicated by the presence of visible emissions, which was the first indicator discussed. A pressure drop across the baghouse also serves to indicate that there is airflow through the control device. There is no

established relationship between baghouse pressure drop and particulate emissions from any of the emission units listed because the emission units have not been source tested for particulate. However, CDC Mead has proposed to keep the pressure drop across the baghouses in manufacturer recommended range because when the baghouse is operating properly, there should not be any visible emissions from the exhaust. Since all of the emission units and baghouses are currently not in operation, the acceptable pressure drop range for each baghouse and dust collector must be approved by SRCAA no later than 90 days after each baghouse and dust collector commences operation and incorporated into the operation and maintenance plan for each baghouse / dust collector.

CDC Mead is required to monitor the pressure drop across each baghouse and 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 and 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. The baghouse pressure gauges 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.

The indicator range chosen for the baghouses is the pressure drop range recommended by the manufacturer, or an alternate range approved by SRCAA, which must be established and approved by SRCAA no later than 30 days after each baghouse commences operation. If the pressure drop is outside of this acceptable range, an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 24 hours from discovery, to return the equipment to normal operation (i.e., pressure drop brought within acceptable range) 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 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. CDC Mead is required to 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.

For the three boilers at CDC Mead, the NOC order specifies that monitoring for compliance with the opacity and particulate matter standards shall be accomplished by performing a boiler functional integrity inspection on a monthly basis 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.

For 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),

the NOC orders specify that monitoring for compliance with the opacity and particulate matter standards shall be accomplished by performing a baghouse functional integrity inspection 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 (III), Condition 2, 7/6/09] [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] [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] [40 CFR Part 64, 7/1/01] NOTE: Portions of this MRRR are gapfilling

Condition 48: Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY [SRCAA Regulation I, 6.02, 9/1/05 - STATE/LOCAL ONLY]

MRRR: The MRRR is the same as for Condition 47.

Condition 49: 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. [WAC 173-400-040(2), 1/10/05 - STATE/LOCAL ONLY] [SRCAA Regulation I, 6.05.A, 3/4/04(11/12/93)]

MRRR: CDC Mead must perform weekly inspections of the facility during daylight hours while the facility is operating to verify that fallout is not occurring and must record and investigate complaints received regarding fallout. Weekly inspections should reasonably assure compliance because the property is large and is not adjacent to any neighbors (i.e., likelihood of impacting neighbors is low).

If potential violations of the requirement are observed during the weekly inspections and/or as part of the complaint investigation, CDC Mead must take timely and appropriate corrective action.

Taking corrective action does not relieve CDC Mead from the obligation to comply with the underlying emission limitation, nor does it relieve CDC Mead from reporting any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

CDC Mead must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit condition 22-Records of Required Monitoring Information. Records must be kept in accordance with Condition 26-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

For permit conditions that require reasonable precautions to be taken or

that call for the use of recognized good practices or procedures or effective control apparatus and measures, examples of reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures are given in the permit.

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

Condition 50: 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, transporting, and /or storing PM; and
- e) Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

[SRCAA Regulation I, 6.05.C, 3/4/04(11/12/93)] [SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)] [WAC 173-400-040(3)(a), 1/10/05(11/12/93)] [SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)] [WAC 173-400-040(8)(a), 1/10/05(8/20/93)]

MRRR: The same monitoring is required as for WAC 173-400-040(2) – Fallout, given in Condition 49. CDC Mead must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition 51: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4). [WAC 173-400-040(4), 1/10/05- STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Fallout, given in Condition 49. CDC Mead must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition 52: 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 [SRCAA Regulation, 6.04, 3/4/04 - STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Fallout, given in Condition 49. CDC Mead must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition 53: 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 [WAC 173-400-040(5), 1/10/05(8/20/93)] [SRCAA Regulation I, 6.06.A, 3/4/04 - STATE/LOCAL ONLY]

MRRR: The monitoring is the same as for WAC 173-400-040(2) - Fallout, given in Condition 49. CDC Mead must perform weekly inspections during daylight hours while the facility is operating, investigate complaints, and take corrective action if potential problems are identified. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilling MRRR.

Condition 54: 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 [WAC 173-400-040(7), 8/15/01(8/20/93)] [SRCAA Regulation, 6.07, 1/13/99 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 55: 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). [WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01(2/19/91)]

MRRR: The only emission units subject to this requirement are the three boilers.

The NOC order specifies that monitoring for compliance with the opacity and particulate matter standards shall be accomplished by performing a boiler functional integrity inspection on a monthly basis 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.

Monthly inspections of the boilers should reasonably assure compliance because the boilers burn only natural gas, which is a clean burning fuel which does not create high levels of particulate emissions when burned in properly operated combustion units.

It should be noted that the two anode baking furnaces are also considered combustion units, but are subject to a more stringent grain loading standard of 0.005 gr/dscf given in Condition 69 which assures compliance with this general grain loading standard.

[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.

Condition 56: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060. [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY]

MRRR: The MRRR is the same as for Condition 47, including weekly inspections during daylight hours while the facility is operating for the purpose of observing points of potential visible emissions and PM emissions from the significant emission units at the facility, except for those emission units that are subject to the CAM requirements and those emission units that have specific monitoring for opacity and particulate standards specified in the NOC orders. The emission units subject to CAM must perform daily inspections and monitor the pressure drop across the baghouse for those units with controlled potential particulate emissions above 5 tpy. The only difference between the monitoring for Condition 56 and Condition 47 is that CDC Mead is required to perform RM 5 testing for particulate emissions if visible emissions are observed and the equipment is being operated properly.

[SRCAA Order 09-02 (III), Condition 2, 7/6/09] [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] [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] [40 CFR Part 64, 7/1/01] NOTE: Portions of this MRRR are gapfilling

Condition 57: 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 [WAC 173-400-040(6), 1/10/05(8/20/93)]

MRRR: The only significant emission units that this requirement applies to are the combustion units, which include the three boilers and the two anode baking furnaces.

The two anode baking furnaces exhaust through the main air control stack. CDC Mead is required to perform a source test for SO₂ on the main air control stack no less than once every three calendar months,

using EPA Reference Methods in 40 CFR 60, Appendix A or B, based on the average of three one-hour test runs.

For the three boilers, SRCAA can request CDC Mead to test the main boiler and/or the standby boilers for SO₂ at any time. With the typical sulfur content in natural gas, SO₂ emissions from a properly operated and maintained boiler should not exceed the SO₂ limit of 1000 ppm. To ensure the boilers are properly operated and maintained, CDC Mead is required to conduct a boiler functional integrity inspection on a weekly basis that includes visual checks for visible emissions, leaks in the ductwork and housing, excess vibration, and any other boiler related performance indicators. If problems are observed, the permittee must initiate corrective action no later than 24 hours after the problem is observed.

[SRCAA Order 08-02 (VII), Condition 1, 7/6/09] [SRCAA Order 08-02 (III), Condition 1, 7/6/09] [SRCAA Order 08-02 (III), Condition 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 58: 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. [WAC 173-400-200, 1/10/05(2/19/91)]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 59: No varying of emissions according to atmospheric conditions or ambient concentrations is allowed, except as allowed under WAC 173-400-205 [WAC 173-400-205, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 60: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA Regulation I, 6.01 [Chapter 173-425 WAC, 3/13/00(10/18/90) - STATE/LOCAL ONLY] [SRCAA Regulation I, 6.01, 3/4/04 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 61: Handling and use of chlorofluorocarbons (CFCs) must be in accord with 40 CFR Part 82. [40 CFR Part 82, 2006]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Emission Limitations for Green Carbon Area

This subsection of the permit covers emission units in the green carbon area that either have additional applicable requirements or additional monitoring, recordkeeping, and reporting requirements (MRRR), beyond those listed in the Facility-Wide Emission Limitations portion of the permit. Not all significant emission units are listed in the permit, only those with additional requirements are listed. The specific emission units covered in this section of the permit are given in Table 2 on Page 8.

The following requirements are included in this section:

Condition 62: 3-1, 3-7 & 3-10: Particulate matter from the baghouse stack shall not exceed 0.01 gr/dscf. [SRCAA Order 08-02 (V), Condition 1, 7/6/09] [SRCAA Order 08-02 (VI), Condition 1, 7/6/09] [SRCAA Order 08-02 (IV) Condition 1, 7/6/09]

MRRR: For all three baghouses, the coke unloading baghouse (3-1), green scrap & coke crusher/storage/transfer/batching, ball mill baghouse (3-7), and green carbon vacuum system baghouse (3-10), the NOC approval orders require that CDC Mead perform a baghouse functional integrity inspection on a weekly basis that includes visual checks for visible emissions, leaks in the ductwork and housing, excess vibration, pressure drop, and sight glass readings (if available). If problems are observed from the baghouse, corrective action must be initiated no later than 24 hours after the problem is observed.

For the green carbon scrap & coke crushing / storage / transfer / batching / ball mill baghouse (3-7), CDC Mead is subject to the CAM requirements summarized in the MRRR associated with Condition 47 (daily inspections for visible emissions and monitoring pressure drop across baghouse). See MRRR associated with Condition 47 for a discussion on CAM applicability and CAM requirements.

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

Condition 63: 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. [SRCAA Order 08-02 (V), Condition 2, 7/6/09] [SRCAA Order 08-02 (VI), Condition 2, 7/6/09] [SRCAA Order 08-02 (IV), Condition 2, 7/6/09]

MRRR: The MRRR is the same as for Condition 62. For all three baghouses, the NOC approval orders for the three baghouses (3-1, 3-7 & 3-10) require that CDC Mead perform a baghouse functional integrity inspection on a weekly basis that includes visual checks for visible emissions, leaks in the ductwork and housing, excess vibration, pressure drop, and sight glass readings (if available). If problems are observed from the baghouse, corrective action must be initiated no later than 24 hours after the problem is observed.

For the green carbon scrap & coke crushing / storage / transfer / batching / ball mill baghouse (3-7), CDC Mead is subject to the CAM requirements summarized in the MRRR associated with Condition 47 (daily inspections for visible emissions and monitoring pressure drop across baghouse). See MRRR associated with Condition 47 for a discussion on CAM applicability and CAM requirements.

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

Condition 64: 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. [SRCAA Order 08-02 (V), Condition 4, 7/6/09] [SRCAA Order 08-02 (VI), Condition 4, 7/6/09] [SRCAA Order 08-02 (IV), Condition 4, 7/6/09]

MRRR: The NOC approval orders for the three baghouses (3-1, 3-7 & 3-10) require that CDC Mead perform a weekly baghouse functional integrity inspection 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 must be kept of all inspections and corrective actions.

In addition, the NOC approval orders require CDC Mead to 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 must 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.

[SRCAA Order 08-02 (V), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VII), Condition 2 & 3, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (II), Condition 3 & 4, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Emission Limitations for Baked Carbon Area

This subsection of the permit covers emission units in the baked carbon area that either have additional applicable requirements or additional monitoring, recordkeeping, and reporting requirements (MRRR), beyond those listed in the Facility-Wide Emission Limitations portion of the permit. Not all significant emission units are listed in the permit, only those with additional requirements are listed. The specific emission units covered in this section of the permit are given in Table 3 on Page 8.

The following requirements are included in this section:

Condition 65: 4-1: Carbon monoxide (CO) emissions shall not exceed 940.6 tons per year. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The NOC approval order for the two anode baking furnaces requires that CDC Mead perform annual stack testing for CO at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down). The anode baking furnaces were tested in 1998-99, with average CO results of 75.8 pounds per hour (translates to 332 tons per year based on 8,760 hours/hr).

Per the NOC, to calculate the annual CO emissions, 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. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

Condition 66: 4-1: Nitrogen oxide (NOx) emissions shall not exceed 123.6 tons per year. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The NOC approval order for the two anode baking furnaces requires that CDC Mead perform annual stack testing for NOx at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down). The anode baking furnaces were tested in 1998-99, with average NOx results of 21.2 pounds per hour (translates to 93 tons per year based on 8,760 hours/hr).

Per the NOC, to calculate the annual NOx emissions, 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. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

Condition 67: 4-1: Volatile organic compound (VOC) emissions shall not exceed 248 tons per year. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The NOC approval order for the two anode baking furnaces requires that CDC Mead perform annual stack testing for VOC at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down). The anode baking furnaces were tested in 1998-99, with average VOC results of 15.6 pounds per hour (translates to 68 tons per year based on 8,760 hours/hr).

Per the NOC, to calculate the annual VOC emissions, 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 08-02 (VII), Condition 1, 7/6/09]

Condition 68: 4-1: Sulfur dioxide (SO₂) emissions shall not exceed 2700 pounds per day. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The NOC approval order for the two anode baking furnaces requires that CDC Mead perform stack testing at least once every three calendar months for sulfur dioxide at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down). The anode baking furnaces were tested in 1999, with average SO₂ results of 72.1 pounds per hour (translates to 1,730 pounds per day based on 24 hours/day).

Per the NOC, to calculate the daily SO₂ emissions, 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. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

Condition 69: 4-1: Particulate matter emissions shall not exceed 80 pounds per day and 0.005 gr/dscf. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The required monitoring was established for the purposes of Compliance Assurance Monitoring (CAM), authorized by 40 CFR Part 68, for the anode baking furnaces.

CAM must be designed to provide reasonable assurance of compliance with emission limitations or standards for a pollutant-specific emission unit (PSEU). In order for a PSEU to be subject to CAM, the three conditions described below must be met. The manner in which they are met by the emission units given in the bulleted list above for particulate matter is discussed below:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the anode baking furnaces, CDC Mead has estimated the pre-controlled PTE of particulate matter for each emission unit to be over the major source threshold of 100 tpy, established in WAC 173-401-200(17).

For emission units subject to CAM, if the post-controlled PTE is estimated to be more than 100 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled PTE of particulate matter from each of the emission units is estimated to be less than 100 tons per year, based on the estimate given in the CDC Mead AOP renewal application. Therefore, the emission units subject to CAM are not considered to be large emissions unit, since post-controlled emissions are less than 100 tons per year. Per 40 CFR 64.3(b)(iii), the frequency of data collection may be less frequent than 4 times per hour, but must include some type of data collection at least once per 24-hour period.

2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the anode baking furnaces, the particulate emissions are controlled by a scrubber.
3. The PSEU must be subject to an emission limit for the applicable pollutant. In the case of the anode baking furnaces, a particulate standard of 80 pounds per day and 0.005 gr/dscf applies.

The proposed CAM for the anode baking furnaces has been designed to rely on continuous opacity monitoring and scrubber inlet temperature as the performance indicators.

Opacity was selected as the performance indicator because it is indicative of good operation and maintenance of the scrubber and because of the general correlation between particulate matter emissions and opacity (i.e.,

opacity are an indicator of particulate matter). When the scrubber is operating optimally, there should be minimal opacity from the exhaust. In general, an increase in opacity indicates reduced performance of the control equipment.

The selected indicator range is the 5% opacity standard contained in the NOC for the equipment. Per 40 CFR 64.3(d)(3)(ii), if an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range. There is no established relationship between particulate emissions and opacity for the anode baking furnaces. However, when the emission unit resumes operation, performance testing for particulate matter is required to be performed every 3 calendar months, so performance test will be available within several months of start-up. The anode baking furnaces were last source tested in 1998, with particulate results of 0.0027 gr/dscf and 0.486 lb/hr (which translates to ~12 pounds per day, based on 24 hrs/day operation). During the test, the COM was not yet installed, but the average opacity during Run #1 of the test was 0%, based on EPA Method 9 visible emissions observations. SRCAA is of the opinion that continuously monitoring opacity and 5% opacity as the indicator range is acceptable monitoring for the particulate emission standard because it will continuously monitor the performance of the scrubber. When the scrubber is operating properly, there should be minimal opacity (i.e., <5%) from the exhaust, and the particulate emissions should be similar to the test results (0.0027 gr/dscf).

CDC Mead is required to 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.

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.

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.

In addition to opacity, the permittee is required to monitor the scrubber inlet temperature as an indicator of the scrubber operational status. A scrubber bypass can occur when the inlet temperature drops too low. Therefore, as an indicator to detect any bypass of the scrubber, CDC Mead is required to monitor the scrubber inlet temperature continuously with a temperature indicator which must 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. The temperature indicator and pre-heat ring must be operated in accordance with the O&M plan for the anode baking furnaces and scrubber.

The scrubber inlet temperature must 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 O&M 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 CDC Mead must notify maintenance personnel to inspect the equipment and take corrective action to return it to normal operation. Records shall be kept of the date, time, duration, and magnitude of all scrubber inlet temperature excursions.

CDC Mead is required to 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.

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.

In addition to the CAM requirements, the NOC approval order for the two anode baking furnaces requires that CDC Mead perform stack testing at least once every three calendar months for particulate matter at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down). Per the NOC, to calculate the daily particulate matter emissions, 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.

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

Condition 70: 4-1: Fluoride emissions shall not exceed 0.02 pounds per ton of green anode baked. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The required monitoring was established for the purposes of Compliance Assurance Monitoring (CAM), authorized by 40 CFR Part 68, for the anode baking furnaces.

CAM must be designed to provide reasonable assurance of compliance with emission limitations or standards for a pollutant-specific emission unit (PSEU). In order for a PSEU to be subject to CAM, the three conditions described below must be met. The manner in which they are met by the emission units given in the bulleted list above for fluoride is discussed below:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the anode baking furnaces, CDC Mead has estimated the pre-controlled PTE of fluoride for each emission unit to be over the major source threshold of 100 tpy, established in WAC 173-401-200(17).

For emission units subject to CAM, if the post-controlled PTE is estimated to be more than 100 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled PTE of fluoride from each of the emission units is estimated to be less than 100 tons per year, based on the estimate given in the CDC Mead AOP renewal application. Therefore, the emission units subject to CAM are not considered to be large emissions unit, since post-controlled emissions are less than 100 tons per year. Per 40 CFR 64.3(b)(iii), the frequency of data collection may be less frequent than 4 times per hour, but must include some type of data collection at least once per 24-hour period.

2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the anode baking furnaces, the fluoride emissions are controlled by a scrubber.
3. The PSEU must be subject to an emission limit for the applicable pollutant. In the case of the anode baking furnaces, a fluoride standard of 0.02 pounds per ton of green anode baked applies.

The proposed CAM for fluoride is the same as described for particulate matter in Condition 69 above. Opacity was selected as the performance indicator because it is indicative of good operation and maintenance of

the scrubber and because of the general correlation between particulate matter emissions (fluoride is part of the particulate matter emissions) and opacity (i.e., opacity is an indicator of particulate matter and therefore, fluoride emissions). When the scrubber is operating optimally, there should be minimal opacity from the exhaust. In general, an increase in opacity indicates reduced performance of the control equipment.

In addition, CDC Mead is required to monitor scrubber inlet temperature as an indicator of scrubber operational status and to detect any bypass of the scrubber.

In addition to the CAM requirements, the NOC approval order for the two anode baking furnaces requires that CDC Mead perform stack testing at least once every three calendar months for fluoride at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down).

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

Condition 71: 4-1: Opacity from the stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The anode baking furnaces are not subject to the CAM requirements for opacity even though it meets the CAM applicability criteria (i.e., has pre-control PTE of over 100 tpy, utilizes air pollution control equipment and is subject to an opacity standard) because §64.2(b)(vi) exempts emission limitations which require the use of a continuous compliance demonstration method. Since the Notice of Construction for the baked carbon scrubber requires the use of a Continuous Opacity Monitor (COM), which is a continuous compliance demonstration method, the baked carbon scrubber is exempt from the CAM requirements for opacity.

The NOC approval order for the anode baking furnaces requires that CDC Mead 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.

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. [SRCAA Order 08-02 (VII), Condition 1 & 4, 7/6/09]

Condition 72: 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. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The NOC approval order for the anode baking furnaces requires that CDC Mead perform stack testing at least once every six calendar months for Polycyclic Aromatic Hydrocarbons (PAHs), using speciation of the extractable matter from EPA Reference Method 315 at the stack of the main air control system associated with the anode baking furnaces. The stack testing is only required when the anode baking furnaces are in operation (i.e., not when they are shut down).

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

Condition 73: 4-2 & 4-3: Particulate matter emissions shall not exceed 0.005 gr/dscf. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: For the north anode cleaner baghouse (4-2) and south anode cleaner baghouse (4-3), CDC Mead is subject to the CAM requirements summarized in the MRRR associated with Condition 47 (daily inspections for visible emissions). See MRRR associated with Condition 47 for a discussion on CAM applicability and CAM requirements.

In addition to the visible emission inspections, the NOC approval orders for the baghouses (4-2 & 4-3) require that CDC Mead perform a baghouse functional integrity inspection on a weekly basis that includes visual checks for visible emissions, leaks in the ductwork and housing, excess vibration, pressure drop, and sight glass readings (if available). If problems are observed from the baghouse, corrective action must be initiated no later than 24 hours after the problem is observed.

It should be noted that the condition in the consolidated order originally applied to the ACS fresh and reacted alumina bin vent dust collectors. These units are both routed to the baked carbon scrubber (emission unit 4-1), so they are covered as part of the baked carbon scrubber emissions.

[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] [SRCAA Order 08-02 (V), Condition 3, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3, 7/6/09] [SRCAA Order (VII), Condition 2, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3, 7/6/09] [SRCAA Order 08-02 (II), Condition 3, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] [40 CFR Part 64, 7/1/01]– NOTE: portions of this MRRR are gapfilled.

Condition 74: 4-2 & 4-3: Opacity from each stack shall not exceed 5% for more than six consecutive minutes in any sixty-minute period. [SRCAA Order 08-02 (VII), Condition 1, 7/6/09]

MRRR: The monitoring is the same as for Condition 73.

[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] [SRCAA Order 08-02 (V), Condition 3, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3, 7/6/09] [SRCAA Order (VII), Condition 2, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3, 7/6/09] [SRCAA Order 08-02 (II), Condition 3, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] [40 CFR Part 64, 7/1/01]– NOTE: portions of this MRRR are gapfilled.

Condition 75: 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. [SRCAA Order 08-02 (VII), Condition 3, 7/6/09]

MRRR: The NOC approval order for the equipment requires that CDC Mead perform a weekly baghouse functional integrity inspection 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 must be kept of all inspections and corrective actions.

In addition, the NOC approval order requires CDC Mead to 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 must 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.

[SRCAA Order 08-02 (V), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VII), Condition 2 & 3, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (II), Condition 3 & 4, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Emission Limitations for Ancillary Operations

This subsection of the permit covers emission units in the ancillary operations area that either have additional applicable requirements or additional monitoring, recordkeeping, and reporting requirements (MRRR), beyond those listed in the Facility-Wide Emission Limitations portion of the permit. Not all significant emission units are listed in the permit, only those with additional requirements are listed. The specific emission units covered in this section of the permit are given in Table 4 on Pages 8-9.

Boiler 3 is subject to the requirements of 40 CFR 60, Subpart Dc. However, since Boiler 3 burns natural gas only, there are no applicable requirements from 40 CFR 60, Subpart Dc except for monthly fuel usage records as specified in 40 CFR 60.48c(g)(2).

The following requirements are included in this section:

Condition 76: 8-4, 8-6 & 8-7: Particulate matter from the baghouse stack shall not exceed 0.01 gr/dscf. [SRCAA Order 08-02 (VIII), Condition 1, 7/6/09] [SRCAA Order 08-02 (II), Condition 1, 7/6/09]

MRRR: CDC Mead is subject to the CAM requirements summarized in the MRRR associated with Condition 47 (daily inspections for visible emissions and pressure drop monitoring for the railcar unloading / south hopper, fresh ore storage / transfer baghouse #480). See MRRR associated with Condition 47 for a discussion on CAM applicability and CAM requirements.

In addition to the visible emission inspections and pressure drop monitoring (for 8-4 only), the NOC approval orders for the baghouses require that CDC Mead perform a baghouse functional integrity inspection on a weekly basis that includes visual checks for visible emissions, leaks in the ductwork and housing, excess vibration, pressure drop, and sight glass readings (if available). If problems are observed from the baghouse, corrective action must be initiated no later than 24 hours after the problem is observed.

[40 CFR Part 64, 7/1/01] [SRCAA Order 08-02 (V), Condition 3, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3, 7/6/09] [SRCAA Order 08-02 (VII), Condition 2, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3, 7/6/09] [SRCAA Order 08-02 (II), Condition 3, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 77: 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. [SRCAA Order 08-02 (VIII), Condition 2, 7/6/09] [SRCAA Order 08-02 (II), Condition 2, 7/6/09]

MRRR: The monitoring is the same as for Condition 76.

[40 CFR Part 64, 7/1/01] [SRCAA Order 08-02 (V), Condition 3, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3, 7/6/09] [SRCAA Order 08-02 (IV),

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Condition 3, 7/6/09] [SRCAA Order 08-02 (VII), Condition 2, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 3, 7/6/09] [SRCAA Order 08-02 (II), Condition 3, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 78: 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. [SRCAA Order 008-02 (VIII), Condition 4, 7/6/09] [SRCAA Order 08-02 (II), Condition 4, 7/6/09]

MRRR: The NOC approval orders for the equipment require that CDC Mead perform a weekly baghouse functional integrity inspection 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 must be kept of all inspections and corrective actions.

In addition, the NOC approval orders require CDC Mead to 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 must 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.

[SRCAA Order 08-02 (V), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VI), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (IV), Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (VII), Condition 2 & 3, 7/6/09] [SRCAA Order 08-02, Condition 3 & 4, 7/6/09] [SRCAA Order 08-02 (II), Condition 3 & 4, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 79: 8-33: Nitrogen oxides emission concentrations when firing natural gas shall not exceed 40 ppmv @ 3% O₂. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The NOC order for the boiler requires that CDC Mead perform emission testing for NO_x and CO on the main boiler at least once every five years. In addition, SRCAA can request that CDC Mead test the boiler at any time. The boiler was last tested in 1995 with average NO_x results of 27.5 ppm @ 3% O₂.

In addition, the NOC order requires that CDC Mead perform a boiler functional integrity inspection on a monthly basis 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 08-02 (III), Condition 1 & 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 80: 8-33: Carbon monoxide emission concentrations when firing natural gas shall not exceed 200 ppmv @ 3% O₂. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The monitoring is the same as for Condition 79. CDC Mead is required to perform stack testing for CO at least once every five years and perform a boiler inspection on a weekly basis. The boiler was last tested in 1995 with average CO results of 90.7 ppm @ 3% O₂.

[SRCAA Order 08-02 (III), Condition 1 & 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 81: 8-32: Nitrogen oxides emission concentrations in the boiler plenum when firing natural gas shall not exceed 130 ppmv @ 3% O₂. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The NOC order for the boilers states that SRCAA can request that CDC Mead test the standby boilers at any time.

In addition, the NOC order requires that CDC Mead perform a boiler functional integrity inspection on a monthly basis 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 08-02 (III), Condition 1 & 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 82: 8-32: Carbon monoxide emission concentrations in the boiler plenum when firing natural gas shall not exceed 400 ppmv @ 3% O₂. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The monitoring is the same as for Condition 81.

[SRCAA Order 08-02 (III), Condition 1 & 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 83: 8-32 & 8-33: Particulate emissions from any combination of boiler operation shall not exceed 1.9 tons per year. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The NOC order for the boilers states that SRCAA can request that CDC Mead test the boilers for particulate matter at any time. CDC Mead is required to record the numbers of hours each month during which each boiler operates. 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.

In addition, the NOC order requires that CDC Mead perform a boiler functional integrity inspection on a monthly basis 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.

[SRCAA Order 08-02 (III), Condition 1, 2, & 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.

Condition 84: 8-32 & 8-33: Sulfur dioxide emissions from any combination of boiler operation shall not exceed 1.5 tons per year. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The monitoring is the same as for Condition 83. The NOC order for the boilers states that SRCAA can request that CDC Mead test the boilers for sulfur dioxide at any time. CDC Mead is required to track the hours that each boiler operates, track the monthly fuel usage for Boiler 3, and calculate annual emissions. In addition, CDC Mead is required to perform a monthly boiler functional integrity inspection.

[SRCAA Order 08-02 (III), Condition 1, 2, & 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.

Condition 85: 8-32 & 8-33: Volatile organic compound emissions from any combination of boiler operation shall not exceed 0.8 tons per year. [SRCAA Order 08-02 (III), Condition 1, 2, 7/6/09]

MRRR: The monitoring is the same as for Condition 83. The NOC order for the boilers states that SRCAA can request that CDC Mead test the boilers for volatile organic compound emissions at any time. CDC Mead is required to track the hours that each boiler operates, track the monthly fuel usage for Boiler 3, and calculate annual emissions. In addition, CDC Mead is required to perform a monthly boiler functional integrity inspection.

[SRCAA Order 08-02 (III), Condition 1, 2, & 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.

Condition 86: 8-32 & 8-33: Carbon monoxide emissions from any combination of boiler operation shall not exceed 27.8 tons per year. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The NOC order for the boiler requires that CDC Mead perform emission testing for CO on the main boiler at least once every five years. In addition, SRCAA can request that CDC Mead test the boilers at any time. CDC Mead is required to track the hours that each boiler operates during each month, track the amount of fuel combusted in Boiler 3 during each month, and calculate annual emissions. CDC Mead is also required to perform a monthly boiler functional integrity inspection.

[SRCAA Order 08-02 (III), Condition 1, 2, & 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.

Condition 87: 8-32 & 8-33: Nitrogen oxides emissions from any combination of boiler operation shall not exceed 10.9 tons per year. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The monitoring is the same as for Condition 86. The NOC order for the boiler requires that CDC Mead perform emission testing for NOx on the main boiler at least once every five years. In addition, SRCAA can request that CDC Mead test the boilers at any time. CDC Mead is required to track the hours that each boiler operates, track the amount of fuel combusted in Boiler 3 each month, and calculate annual emissions. In addition, CDC Mead is required to perform a monthly boiler functional integrity inspection.

[SRCAA Order 08-02 (III), Condition 1, 2, & 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.

Condition 88: 8-32 & 8-33: Opacity from the boiler stacks shall not exceed 5% for more than six consecutive minutes in any sixty-minute period. [SRCAA Order 08-02 (III), Condition 1, 7/6/09]

MRRR: The NOC order for the boilers states that SRCAA can request that CDC

Mead test the boilers for opacity at any time.

In addition, the NOC order requires that CDC Mead perform a boiler functional integrity inspection on a monthly basis 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 08-02 (III), Condition 1 & 2, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: portions of this MRRR are gapfilled.

Condition 89: 8-32 & 8-33: The boilers shall burn exclusively pipeline quality natural gas. [SRCAA Order 08-02 (III), Condition 3, 7/6/09]

MRRR: No monitoring is required. As with all permit terms, CDC Mead must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 90: 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. [SRCAA Order 08-02 (III), Condition 4, 7/6/09]

MRRR: The NOC order for the boiler requires that CDC Mead measure and report, on an annual basis, the annual average pounds per hour of steam generated by the main boiler. [SRCAA Order 08-02 (III), Condition 4, 7/6/09]

Condition 91: 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. [SRCAA Order 08-02 (III), Condition 5, 7/6/09]

MRRR: The NOC order requires that CDC Mead perform a boiler functional integrity inspection on a monthly basis 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.

In addition, the NOC approval orders require CDC Mead to 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 must 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.

[SRCAA Order 08-02 (V), Condition 4, 7/6/09] [SRCAA Order 08-02 (VI), Condition 4, 7/6/09] [SRCAA Order 08-02 (IV), Condition 4, 7/6/09] [SRCAA Order 08-02 (VII), Condition 3, 7/6/09] [SRCAA Order 08-02 (VIII), Condition 4, 7/6/09] [SRCAA Order 08-02 (II), Condition 4, 7/6/09] [SRCAA Order 08-02 (III), Condition 5, 7/6/09] [WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Order 08-02 (III), Condition 2, 7/6/09] – NOTE: portions of this MRRR are gapfilled.

Emission Limitations for Maintenance Operations

This subsection of the permit covers emission units in the maintenance operations area that either have additional applicable requirements or additional monitoring, recordkeeping, and reporting requirements (MRRR), beyond those listed in the Facility-Wide Emission Limitations portion of the permit. Not all significant emission units are listed in the permit, only those with additional requirements are listed. The specific emission units covered in this section of the permit are given in Table 5 on Pages 9.

The following requirements are included in this section:

Condition 92: 9-5: Bricks to be crushed must be thoroughly wetted in the charge bucket prior to feeding the jaw crusher. [SRCAA Order 08-02 (I), Condition 1, 7/6/09]

MRRR: An inspection log of the brick crusher shall be maintained. Inspections shall be conducted at least monthly by the permittee, on a form approved by SRCAA. [SRCAA Order 08-02 (I), Condition 3, 7/6/09]

Condition 93: 9-5: No visible emissions shall be present during operation of the jaw crusher. [SRCAA Order 08-02 (I), Condition 2, 7/6/09]

MRRR: CDC Mead is required to conduct weekly inspections during daylight hours while the facility is operating for the purpose of observing points of potential visible emissions and PM emissions (see MRRR associated with Condition 47). In addition, an inspection log of the brick crusher shall be maintained. Inspections shall be conducted at least monthly by the permittee, on a form approved by SRCAA.

[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] [SRCAA Order 08-02 (I), Condition 3, 7/6/09] NOTE: portions of this MRRR are gapfilled

Condition 94: 9-5: Fugitive emissions from the crusher shall not exceed 15% opacity. [40 CFR 60.672(c), 10/17/00] [WAC 173-400-115, 5/8/07]

MRRR: CDC Mead is required to conduct weekly inspections during daylight hours while the facility is operating for the purpose of observing points of potential visible emissions and PM emissions (see MRRR associated with Condition 47). In addition, an inspection log of the brick crusher shall be maintained. Inspections shall be conducted at least monthly by the permittee, on a form approved by SRCAA.

It should be noted that 40 CFR 60, Subpart OOO requires an initial performance test (using EPA Method 9) be performed on the crusher within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility. The crusher was permitted by Ecology in 1989 and installed at some point after 1989. Ecology was the agency with regulatory oversight for the crusher from 1989 – March 2006. Therefore, Ecology would have been the agency responsible for ensuring that the initial performance test was completed. Based on the files that SRCAA received from Ecology, it is unknown if and when the initial performance test was conducted. However, the periodic monitoring established for the Subpart OOO 15% opacity standard (weekly inspections to check for visible emissions and maintaining an inspection log of crusher) should assure compliance with the opacity standard.

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] [SRCAA Order 08-02 (I), Condition 3, 7/6/09] NOTE: portions of this MRRR are gapfilled

PERMIT SHIELD FINDINGS

This final section of the permit lists regulations for which the facility has requested, and SRCAA proposes to grant, a permit shield per WAC 173-401-640(2). The findings on which this shield is based are given below. These findings are summarized in the permit.

Requirements For Which a Shield Will Be Granted

40 CFR 60, Subpart S - Standards of Performance for Primary Aluminum Plants [10/17/00]

Findings: CDC Mead does not perform primary aluminum activities. All of the primary aluminum equipment has been removed from the facility.

RCW 70.94.610 - Burning Used Oil Fuel in Land-Based Facilities [1991]

Findings: CDC Mead does not burn used oil. The boilers at the facilities only burn natural gas

WAC 173-400-050(2) - Emission Standards for Incinerators [1/10/05]

Findings: CDC Mead does not operate any incinerators, as defined in WAC 173-400-030

WAC 173-400-112 - Bubble Rules [1/10/05]

Findings: CDC has not applied for a bubble under this rule.

WAC 173-400-131 - Issuance of Emission Reduction Credits [1/10/05]

Findings: CDC Mead has not applied for emission reduction credits under this rule.

WAC 173-400-151 - Retrofit Requirements for Visibility Protection [1/10/05]

Findings: CDC Mead has not been determined to cause or contribute to a visibility impairment.

Chapter 173-421 WAC - Emission Control Systems [9/16/87]

Findings: CDC Mead does not perform work on motor vehicle emission systems.

Chapter 173-434 WAC – Solid Waste Incinerator Systems [12/22/03]

Findings: CDC Mead 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]

Findings: CDC Mead 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]

Findings: CDC Mead 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]

Findings: CDC Mead does not have any petroleum liquid storage tanks.

WAC 173-490-205 – Surface Coating of Miscellaneous Metal Parts and Products [2/19/91]

Findings: CDC Mead does not engage in the surface coating of metal parts or products.

Chapter 173-433 WAC – Solid Fuel Burning Devices [9/6/07]

Findings: CDC Mead does not operate any solid fuel burning devices, as defined in WAC 173-433-030.

Requirements For Which a Shield Will Not Be Granted

RCW 70.94.743 – Outdoor Burning – Areas Where Prohibited

Findings: There is nothing that would prohibit CDC Mead from conducting outdoor burning. For this reason, a shield from this requirement is not appropriate.

RCW 70.94.775 – Outdoor Burning – Fires Prohibited – Exceptions

Findings: There is nothing that would prohibit CDC Mead from conducting outdoor burning. For this reason, a shield from this requirement is not appropriate.

Chapter 173-425 WAC – Open Burning

Findings: There is nothing that would prohibit CDC Mead from conducting open burning. The outdoor burning requirements are contained in Condition 60 of this permit. For this reason, a shield from this requirement is not appropriate.

PREPARED BY: _____
April L. Westby

DATE: _____

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

_____, P.E.
April Westby, P.E.

DATE: _____

Ronald J. Edgar, Chief of Technical Services

DATE: _____

William Dameworth, Control Officer

DATE: _____

