



South Coast Air Quality Management District

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March 26, 2014

Mr. Naro Kuch
Environmental Manager
Sierra Aluminum Company
2345 Fleetwood Drive
Riverside, CA 92509

Subject: RECLAIM Facility Permit – Facility I.D. No. 085943

Dear Mr. Kuch:

Please find attached the revised Title Page, Table of Contents, and Section H of your RECLAIM/Title V Facility Permit. The revised sections reflect the approval of the permit revision requested in your Application No. 559106. The proposed revision was submitted to EPA for a 45-day review on February 7, 2014 and EPA completed their review with no comments. This permit revision includes one new permitted equipment and equipment modification for two existing pieces of equipment:

Equipment	Appl. No.	Device No.	Process	Permit Type
Billet Oven	559107	D90	4	PC
Ageing Oven	559108	D84	4	PC
Ageing Oven	559109	D85	4	PC

Please review the attached sections carefully. Insert the enclosed sections into your RECLAIM Facility Permit and discard the earlier version. Questions concerning changes to your permit should be directed to Ms. Monica Fernandez-Neild at 909.396.2202.

Very truly yours,

Mohan Balagopalan
Sr. Air Quality Engineering Manager
Mechanical, Chemical and Ports Permitting

MB:mfn
Enclosure

c: Gerardo Rios, EPA Region IX (R9Airpermits_sc@epa.gov)
Cher Synder, Compliance



FACILITY PERMIT TO OPERATE

**SIERRA ALUMINUM COMPANY
11711-18 06-80 PACIFIC AVE
FONTANA, CA 92337**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



**FACILITY PERMIT TO OPERATE
SIERRA ALUMINUM COMPANY**

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**FACILITY PERMIT TO OPERATE
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: ALUMINUM EXTRUSION					
OVEN, HEAT TREATING, AGE, NATURAL GAS, ALUMINUM, GRANCO-CLARK, MAXON EB4-PAKT BURNERS, WITH LOW NOX BURNER, 5.4 MMBTU/HR A/N: 559108 Permit to Construct Issued: 03/26/14	D84		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 30 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 50 PPMV NATURAL GAS (4) [RULE 2005, 6-3-2011]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, C1.7, C6.12, D28.2, D29.1, D323.1, I297.1
OVEN, HEAT TREATING, AGE, NATURAL GAS, ALUMINUM, GRANCO-CLARK, MAXON EB3-PAKT BURNERS, WITH LOW NOX BURNER, 3.4 MMBTU/HR A/N: 559109 Permit to Construct Issued: 03/26/14	D85		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 30 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 50 PPMV NATURAL GAS (4) [RULE 2005, 6-3-2011]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, C1.7, C6.12, D28.2, D29.1, D323.1, I297.2
OVEN, HEAT TREATING, BILLET, NATURAL GAS, ALUMINUM, GRANCO-CLARK, MODEL 69-35-3 "HOT-JET", WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 5.43 MMBTU/HR A/N: 559107 Permit to Construct Issued: 03/26/14	D90		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 30 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 50 PPMV NATURAL GAS (4) [RULE 2005, 6-3-2011]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, C6.13, D28.2, D29.1, D323.1, I297.3

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (3) Denotes RECLAIM concentration limit
- (4) Denotes BACT emission limit
- (5) (5A) (5B) Denotes command and control emission limit
- (6) Denotes air toxic control rule limit
- (7) Denotes NSR applicability limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (9) See App B for Emission Limits
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.



**FACILITY PERMIT TO OPERATE
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SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**



**FACILITY PERMIT TO OPERATE
SIERRA ALUMINUM COMPANY**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D84	1	4	0
D85	1	4	0
D90	1	4	0



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SIERRA ALUMINUM COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 150 LBS IN ANY ONE DAY

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

F2.2 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
Single Volatile Hazardous Air Pollutant (VHAP)	Less than 10 TONS IN ANY 12-MONTH PERIOD
Combination of Volatile Hazardous Air Pollutants (VHAPs)	Less than 25 TONS IN ANY 12-MONTH PERIOD



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The operator shall comply with the terms and conditions set forth below:

To maintain exemption from the requirements of 40 CFR 63, Subpart M MMMM, the operator shall comply with the Volatile Hazardous Air Pollutant (VHAP) emission limits of this condition. To ensure compliance with the VHAP emission limits of this condition, the operator shall comply with the following recordkeeping requirements:

(a) Comply with Rule 109 (Recordkeeping for Volatile Organic Compound Emissions).

(b) Within 14 calendar days after the end of each month, total and record VHAP emissions for the month and for the previous 12 month period from all equipment and operations that are required to have written permits or are exempt from written permits pursuant to Rule 219. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.

(c) Maintain a single list which includes only the name and address of each person from whom the facility acquired VHAP-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.

(d) Retain all purchase invoices for all VHAP-containing material used or stored at the facility, and all waste manifests for all waste VHAP-containing material removed from the facility.

(e) Retain all records required by this permit at the facility for five years, and make all records available to any District representative upon request.

[40CFR 63 Subpart M MMMM, 1-2-2004]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]



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The operator shall comply with the terms and conditions set forth below:

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

SYSTEM CONDITIONS

S1.2 The operator shall limit the throughput to no more than 3500 gallon(s) per month.

For the purpose of this condition, throughput shall be defined as total primer coating usage for both systems.

[**RULE 1303(b)(1)-Modeling, 5-10-1996; RULE 1303(b)(1)-Modeling, 12-6-2002;**
RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 2, System 1 , 2]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B59.1 The operator shall not use the following material(s) in this device :

Metals contaminated with rubber, plastics, paper, rags, oil, grease, or similar smoke-producing materials



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The operator shall comply with the terms and conditions set forth below:

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D84, D85, D90]

C. Throughput or Operating Parameter Limits

C1.7 The operator shall limit the fuel usage to no more than 2.2 MM cubic feet in any one calendar month.

For the purpose of this condition, fuel usage shall be defined as Natural Gas.

To comply with this condition, the operator shall install and maintain a(n) non-resettable totalizing fuel flow meter to accurately indicate the fuel usage being supplied to the fuel supply line of the Aging Oven.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D84, D85]

C6.12 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 500 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the Aging Oven Exhaust.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 9-10-2010]

[Devices subject to this condition : D84, D85]

FACILITY PERMIT TO OPERATE
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

C6.13 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 1100 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the Billet Oven Exhaust.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 9-10-2010**]

[Devices subject to this condition : D90]

D. Monitoring/Testing Requirements

D28.2 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted every five years, with the first five year period ending June 30, 2005.

The test shall be conducted within 12 months of of the approval of the concentration limit.

[**RULE 2005, 5-6-2005; RULE 2012, 5-6-2005**]

[Devices subject to this condition : D84, D85, D90]

D29.1 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
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The operator shall comply with the terms and conditions set forth below:

NOX emissions	Approved District method	15 minutes	Outlet
CO emissions	Approved District method	15 minutes	Outlet

In addition to the source test requirements of Section E of this facility permit, the facility permit holder shall submit the protocol to the AQMD engineer no later than 45 days prior to the proposed test date, and notify the District of the date and time of the test at least 10 days prior to the test.

The test(s) shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The test shall be conducted to demonstrate compliance with the NOx BACT limit of 50 ppmv at 3 percent Oxygen.

Notwithstanding the requirements of Section E conditions, the source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Mail Completed source test report to SCAQMD, P. O. Box 4941, Diamond Bar, CA 91765

[RULE 2005, 6-3-2011]

[Devices subject to this condition : D84, D85, D90]

FACILITY PERMIT TO OPERATE
~~SIERRA ALUMINUM COMPANY~~

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]



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SIERRA ALUMINUM COMPANY

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The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D84, D85, D90]

I. Administrative

I297.1 This equipment shall not be operated unless the facility holds 1014 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 6-3-2011]

[Devices subject to this condition : D84]

I297.2 This equipment shall not be operated unless the facility holds 1014 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.

[RULE 2005, 6-3-2011]

[Devices subject to this condition : D85]

I297.3 This equipment shall not be operated unless the facility holds 1703 pounds of NOx RTCs in its allocation account to offset the annual emissions increase for the first year of operation. RTCs held to satisfy this condition may be transferred only after one year from the initial start of operation. If the hold amount is partially satisfied by holding RTCs that expire midway through the hold period, those RTCs may be transferred upon their respective expiration dates. This hold amount is in addition to any other amount of RTCs required to be held under other condition(s) stated in this permit.



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The operator shall comply with the terms and conditions set forth below:

[RULE 2005, 6-3-2011]

[Devices subject to this condition : D90]