
SCAPCA ORDER
ISSUED IN ACCORDANCE WITH :

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

ORDER #96-06

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

DATE: April 24, 1996
DATE MODIFIED: May 8, 1996 (correction to Order #)
DATE MODIFIED: October 4, 2000 (Addition of Condition F)
DATE MODIFIED: October 19, 2000 (correction to Condition B)

ISSUED TO: Kaiser Aluminum & Chemical Corporation

SITE LOCATION: Trentwood Works
15000 E Euclid Avenue
Spokane, WA

FACILITY CONTACT: Pat Blau
(509)927-6350

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

SOURCE: Induction Furnaces, RM-21
Secondary Aluminum Production Facility

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

Kaiser's induction furnaces have the potential to emit about 76.2 tons of particulate matter (PM) per year as calculated assuming maximum allowable emissions of 0.1 grains per dry standard cubic foot. As part of the attainment demonstration in the State Implementation Plan (SIP), emissions were modeled, including those from Kaiser's induction furnaces. Kaiser's assumed emissions for this modeling exercise were higher than actual emissions but much lower than the potential to emit. In an effort to maintain the validity of the SIP

attainment demonstration, Kaiser has voluntarily requested that PM10 emissions from the induction furnaces be limited to a level such that Kaiser's potential to emit will be equal to or less than the levels used for the SIP modeling. As allowed in WAC 173-400-091, Kaiser has requested, in Raymond J. Milchovich's letter, dated August 8, 1995, voluntary emission limits on the induction furnaces' potential to emit. Revisions to the order have been made as requested in Patrick Blau's letter, dated March 10, 1999.

Source testing at the facility has shown that PM emissions from the induction furnaces are less than 0.020 grains per dry standard cubic foot, corresponding to 83.0 pounds of PM emitted per day.

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

1. PM10 emissions from the two induction furnaces combined shall not exceed 83.0 pounds per day.

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

A. Visible emissions, as measured by EPA Reference Method 9, shall not exceed 10% (three-minute average).

B. SCAPCA may require testing to verify compliance with the 83.0 pounds per day PM10 emissions limit. Testing shall be done in accordance with EPA reference methods as found in 40 CFR Parts 51 and 60 (1995). PM and/or PM10 emissions shall be determined from the average of three valid 1-hour, or longer, test runs and shall include front and back half particulate matter.

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

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

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

D. Maintenance records shall be kept for the baghouse. Compliance with this condition may

be demonstrated by implementing a computerized preventative maintenance system that regularly schedules and tracks maintenance activities. All records shall be kept for a minimum of two years.

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

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

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

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

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

This order may be appealed to

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

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

ORDERED BY:



ERIC P. SKELTON
DIRECTOR