



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 19 2012

REPLY TO THE ATTENTION OF:

Andrew Hall
Permit Review/ Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216

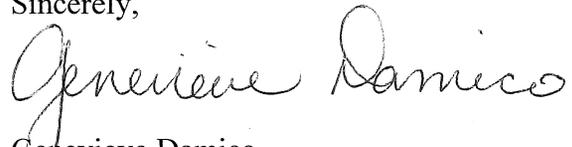
Dear Mr. Hall,

The U.S. Environmental Protection Agency has reviewed the Ohio Environmental Protection Agency's (OEPA) draft Title V renewal permit for Kaiser Aluminum, facility ID 0145010093 and permit # P0083707, located at 600 Kaiser Drive, Ohio. To ensure that the source meets Federal Clean Air Act requirements, EPA has the following comments:

1. Condition B.2.(b)(2) limits the facility-wide potential to emit for hazardous air pollutants (HAP) to avoid major source requirements specified in Subpart RRR. The limited potential for the facility has been set at 9.9 tons per year (TPY) of a single HAP. The calculations used to verify that the facility is in compliance with this facility-wide limitation are based on a stack test conducted in 1999. The primary source of HAP emissions is solid flux used in the remelt furnaces (P005, P006, P007 and P020). Considering that this facility is a synthetic minor source for HAP emissions with a limitation just beneath the threshold for major source status, Ohio should consider require stack testing to verify that the emission factors from the 1999 stack test are still reflective of the facility's operations.
2. Section B.2.(c)(1) provides operational restrictions for chlorine usage, as reactive flux, for emission units P005, P006, P007 and P020. It is not clear from the requirement what type of flux or chlorine content is being utilized at the facility. Chlorine and hydrochloric acid, a HAP, emissions can vary due to the chlorine content in the flux. Ohio should consider adding more specific language limiting the chlorine content in the fluxing agent to ensure that the facility can maintain compliance with its synthetic minor HAP limitation.
3. The permit must include a method to demonstrate compliance with the annual emission limits listed in Applicable Emission Limitations and/or Control Requirements for emission units P028, B019, and B020 in addition to compliance with the hourly emission rate.

We appreciate the opportunity to provide comments on this proposed permit. Please feel free to contact me or Charmagne Ackerman, of my staff, at (312) 886-0448 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section