PART 71 FEDERAL OPERATING PERMIT
STATEMENT OF BASIS

Pimalco
Permit No. GR-OP 04-02

1. Facility Information

a. Permittee

Pimalco (a wholly-owned subsidiary of ALCOA)
6833 West Willis Road
Box 5050
Chandler, AZ 85226

b. Facility location

Pimalco is located in the Lone Butte Industrial Park in Chandler, AZ on the reservation of the Gila River Indian Community.

c. Contact information

Facility Contact:	Amy Vasquez, Environmental Manager (480) 598-2294
Responsible Official:	Donald J. Nelson, Operations Manager (480) 598-2212

d. Description of operations, products

The Pimalco facility is a secondary aluminum production and extrusion operation which produces aluminum extrusions used as structural components for the aircraft industry. The process involves three general categories of operations: aluminum melting/casting, extrusion, and tube operations. Melting/casting operations include scrap charging, melting, alloying, log casting, and sawing. Extrusion operations include heat treatment, extrusion, sawing, and shipment. Tube operations include heat treatment, drawing, stretching, sawing, solvent cleaning, and shipment. Process operations are broken down into four primary departments: 1) Induction Billet Corporation (IBC Plant); 2) Aerospace Plant; 3) Pimalco Seamless Inc. (PSI Plant); and 4) Drawn Tube Mill (DTM Plant).

e. Permitting and/or construction history

EPA's Prevention of Significant Deterioration (PSD) construction permitting program was first promulgated on December 5, 1974. Since Pimalco constructed in 1973, before the Clean Air Act amendments of 1977 established the Prevention of Significant Deterioration (PSD) program, a construction permit from EPA was not required. Installation of new equipment over the years has also not triggered the requirement to apply for a construction permit, since emissions from the new equipment did not exceed the major modification thresholds. Although Pimalco has been grandfathered from construction permitting, future modifications could trigger new applicable requirements. Pimalco is a major source, as defined in 40 CFR Part 71, and is therefore subject to title V permitting requirements (see Section 1.g. below). An initial Part 71 permit was issued to Pimalco on April 25, 2000, with an expiration date of April 25, 2005. Pimalco filed a timely application for a title V renewal on October 18, 2004, received by EPA on October 21, 2004. EPA deemed this application complete on December 21, 2004. Because Pimalco filed a complete application for renewal prior to permit expiration, the title V permit expiration date is extended until this renewal permit is finalized, pursuant to 40 CFR § 71.7(c)(3). A supplement to this application was received by EPA on July 7, 2006 to correct errors in the calculations for potential emissions of hazardous air pollutants ("HAP").

f. Emission-generating units and activities

The emission-generating units and activities at Pimalco are shown in Table 1, below.

Table 1. Emission units and activities

Emission Unit I.D. No.	Unit Description	Associated Control Equipment
DTM Plant		
DTM #1	Moco A Age Anneal Oven (10.5 MMBtu/hr)	DTM #2: Afterburner (VOC control)
DTM #3	Moco D Age Anneal Oven (10.0 MMBtu/hr)	DTM #4: Afterburner (VOC control)
DTM #10	Cold Dip Tank (4, 787.20 Gallons)	None
DTM #14	Wyco Roll Machine (10 Gallons)	None
IBC Plant		
IBC #3	Electric Melting Furnace No. 0	None
IBC #4	Electric Melting Furnace No. 1	None
IBC #5	Electric Melting Furnace No. 2	None
IBC #6	Electric Melting Furnace No. 3	None

Emission Unit I.D. No.	Unit Description	Associated Control Equipment
IBC # 12	622 Filter Box (0.62 MMBtu/hr)	None
IBC #15	Homogenizing Oven #1 (20 MMBtu/hr)	None
IBC #16	Homogenizing Oven #2 (20 MMBtu/hr)	None
IBC #17	Homogenizing Oven #3 (20 MMBtu/hr)	None
Aerospace Plant		
Aerospace #2	Central Age Anneal Oven (10 MMBtu/hr)	None
Aerospace #4	Southwest Age Anneal Oven (9.6 MMBtu/hr)	None
Aerospace #5	Sutton Billet Heater (9.7 MMBtu/hr)	None
Aerospace #12	Protectsol 512 (Enclosed Spraying Chamber - 55 Gal	None
PSI Plant		
PSI #1	UBE Billet Heater (7.0 MMBtu/hr)	None
PSI #4	Lindberg Age Anneal Oven (10 MMBtu/hr)	None
PSI #5	Vertical Heat Treat (8.0 MMBtu/hr)	PSI #6: Afterburner (VOC control - 15 MMBtu/hr)

g. Potential to Emit

Potential to emit (PTE) means the maximum capacity to emit any air pollutant (criteria or HAPs) under its physical and operational design. Any physical or operational limitation on the maximum capacity of Pimalco to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, may be treated as part of its design if the limitation is enforceable by EPA. PTE is meant to be a worst case emissions calculation and is used in many, though not all, cases to determine the applicability of federal requirements. Actual emissions may be much lower than PTE.

Since issuance of Pimalco's initial title V permit, the potential to emit certain pollutants has changed. Table 2, below, shows Pimalco's current potential to emit criteria and hazardous air pollutants and Pimalco's potential to emit at the time of initial permit issuance. Pimalco's current potential to emit CO in excess of 100 tons per year subjects Pimalco to the requirement to obtain a title V operating permit pursuant to 40 CFR Part 71.

Changes in Pimalco's potential to emit NOx, PM10, and CO are due primarily to changes in EPA's AP-42 emission factors for natural gas combustion, which were used by Pimalco to calculate potential emissions. The change in Pimalco's potential to emit hazardous air pollutants is due primarily to greater potential use of raw materials containing chlorine and fluorine due to customer demands for increased product quality. These materials are used to improve surface quality and

to remove alloy impurities.

In this renewal permit, EPA is proposing to impose limits on HAP emissions that would restrict Pimalco to no more than 14.6 tons of total HAP emitted per year, and no more than 7.3 tons of hydrogen fluoride (HF), 6.2 tons of hydrochloric acid (HCl) and 0.4 tons of chlorine (CL_2) emitted per year. The purpose of these limits is to ensure that Pimalco remains an area source for purposes of MACT applicability (see sections 4 and 5, below). The limits will be made enforceable by restricting usage of chlorine, ammonium fluoroborate (AFB), and ammonium bi-fluoride (ABF). Chlorine usage at Pimalco will be limited to 12,000 lb/yr, and AFB and ABF usage at Pimalco will be limited to 10,000 lb/yr, each. Based on conservative stoichiometric calculations, these usage limits will ensure that emissions stay below the limits set for HF, HCl, and Cl_2. Should Pimalco wish to use any other chemicals or compounds that may contribute to emissions of hydrogen fluoride, hydrochloric acid, or chlorine, Pimalco must apply for a revision to this title V permit. Emissions of these three pollutants account for 95% of the total HAP emissions. Potential maximum emissions of all other HAP equal just 0.7 tons per year (compared to 13.9 tons per year for HF, HCl, and Cl_2). The proposed periodic monitoring for these limits is discussed in section 6, below.

Table 2. Pimalco's potential to emit criteria and HAP pollutants

	NOx	*VOC*	*SO_2*	*PM10*	*CO*	*HAP*				
Initial Permit	114	80	1	17	54	*Total*	*HF*	*HCl*	*Cl_2*	*Other*
						3.77	1.47	1.34	0.11	0.85
Renewal Permit	92	80	1	24	102	*Total*	*HF*	*HCl*	*Cl_2*	*Other*
						14.6	7.3	6.2	0.4	0.7

2. Tribe Information

a. General

The Gila River Indian Community traces its roots to the Hohokam Indians who lived and farmed along the Gila River Basin centuries ago. The Community is home to two Tribes, the Pima and Maricopas, and is located 40 miles south of Phoenix in Maricopa and Pinal counties. The 372,000-acre reservation was established by an act of Congress in 1859.

The Gila River Indian Community has three industrial parks housing 36 businesses, though agriculture is still one of the largest industries on the reservation. The Community is home to approximately 11,500 people.

b. Local air quality and attainment status

The Gila River Indian Community, including the Lone Butte Industrial Park in

Chandler, AZ (the area in which Pimalco is located), is currently designated as attainment or unclassifiable for all pollutants for which a National Ambient Air Quality Standard ("NAAQS") has been established, with the exception of PM10. The Gila River Indian Community is part of the Maricopa County/Phoenix Area serious PM10 nonattainment area.

3. EPA Authority

Title V of the Clean Air Act requires that EPA promulgate, administer, and enforce a Federal operating permits program when a State does not submit an approvable program within the time frame set by title V or does not adequately administer and enforce its EPA-approved program. On July 1, 1996 (61 Fed. Reg. 34202), EPA adopted regulations codified at 40 CFR Part 71 setting forth the procedures and terms under which the Agency would administer a Federal operating permits program. These regulations were updated on February 19, 1999 (64 Fed. Reg. 8247) to incorporate EPA's approach for issuing Federal operating permits to covered stationary sources in Indian country.

As described in 40 CFR § 71.4(a), EPA will implement a Part 71 program in areas where a State, local, or Tribal agency has not developed an approved Part 70 program. Unlike States, Indian Tribes are not required to develop operating permits programs, though EPA encourages Tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 Fed. Reg. 7253, February 12, 1998) (also known as the Tribal Authority Rule). Therefore, within Indian country, EPA believes it is generally appropriate that EPA administer and enforce a Part 71 Federal operating permits program for stationary sources until Tribes receive approval to administer their own operating permits programs. The Gila River Indian Community is currently in the process of developing an operating permits program.

4. Inapplicable Requirements

a. 40 CFR Part 63 - Maximum Achievable Control Technology Standards

The Clean Air Act requires EPA to regulate emissions of toxic air pollutants from a published list of industrial sources referred to as "source categories." As required under the Act, EPA has developed a list of source categories that must meet control technology requirements for these toxic air pollutants. The EPA is required to develop regulations (also known as rules or standards) for all industries that emit one or more of the pollutants in significant quantities ("major" sources). "Major" sources are those sources that have the potential to emit 10 tons or more annually of a single hazardous air pollutant or 25 tons or more annually of a combination of hazardous air pollutants. Under the Urban Air Toxics Strategy, EPA is also developing standards to control toxic air pollutants from area sources. "Area" sources are those sources that have a maximum potential to emit under 10 tons annually of a single hazardous air pollutant or 25 tons or more annually of a combination of hazardous air pollutants. Pimalco is an area source because its maximum potential to emit is less than 10 tons per year of any single HAP, and

less than 25 tons per year of combined HAP.

The Clean Air Act (CAA) requires EPA to identify a list of at least 30 air toxics that pose the greatest potential health threat in urban areas; EPA identified a list of 33 air toxics. The CAA also requires EPA to identify and list the area source categories that represent 90 percent of the emissions of the "listed" air toxics and subject them to standards under the CAA (section 112(d)). EPA has identified a total of 70 area source categories which represent 90 percent of the emissions of the listed air toxics. Of these 70 area source categories, 16 have been regulated and the remaining area source standards are under development or will be developed in the future. Table 4 below lists the 16 source categories that are currently regulated.

Table 4. Area source categories currently subject to standards

Chromic Acid Anodizing	Hazardous Waste Incineration
Commercial Sterilization Facilities	Medical Waste Incinerators
Decorative Chromium Electroplating	Portland Cement Manufacturing
Dry Cleaning Facilities	Secondary Aluminum Production
Halogenated Solvent Cleaners	Secondary Lead Smelting
Hard Chromium Electroplating	Municipal Landfills
Publicly Owned Treatment Works	Mercury Cell Chlor-Alkali Plants
Municipal Waste Combustors	Other Solid Waste Incineration

Based on Pimalco's application, this facility does not conduct activities that would subject it to any area source MACT standards, other than the MACT standard for Secondary Aluminum Production which is discussed below, under Section 5 for applicable requirements.

b. <u>40 CFR Part 64 - Compliance Assurance Monitoring</u>

The Compliance Assurance Monitoring requirements of 40 CFR Part 64 apply to pollutant-specific units at major sources, as defined in 40 CFR Parts 70 and 71, that use a control device to achieve compliance with a non-exempted emission limitation or standard. The intent of the CAM rule is to ensure that such control devices are properly operated and maintained so that they do not deteriorate to the point where the owner or operator violates an emission limit. Because Pimalco does not use a control device to achieve compliance with any applicable emission limit or standard, CAM does not apply at this time.

c. 40 CFR Part 68 - Chemical Accident Prevention

Based on Pimalco's application, this facility currently has no regulated substances above the threshold quantities in this rule and therefore is not subject to the requirement to develop and submit a risk management plan. Pimalco has an ongoing responsibility to submit this plan if a substance is listed that the facility has in quantities over the threshold amount or if the facility ever increases the amount of any regulated substance above the threshold quantity.

5. Applicable Requirements

At the time of initial permit issuance (April 25, 2000), this source was not subject to any substantive requirements that control emissions under the Clean Air Act (CAA). The source was not subject to any federal CAA programs such as the Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) (except 40 CFR Part 61, subpart M – Asbestos for Demolition and Renovation), nor was the source subject to any implementation plan such as exists within State jurisdictions. Additionally, the generally applicable requirements of the CFC program under Title VI of the CAA were excluded from the initial permit, as the initial application indicated that Pimalco does not engage in the activities regulated under Title VI.

On March 23, 2000, EPA promulgated 40 CFR Part 63, subpart RRR (the secondary aluminum production MACT), which established national emission standards for hazardous air pollutants from secondary aluminum production facilities. The compliance deadline for existing sources, such as Pimalco, was March 24, 2003. Pimalco was inspected by EPA on February 7, 2005, and was determined to be in compliance with the requirements of 40 CFR Part 63, subparts A and RRR; no violations were identified during this inspection. For this renewal, EPA is adding requirements from MACT subpart RRR for secondary aluminum production, and the general provisions from 40 CFR Part 63, subpart A.

MACT subpart RRR establishes emission standards for metals, dioxins/furans, organic hazardous air pollutants, and acid gases for secondary aluminum plants that are major sources. Affected equipment at a major source include each new and existing aluminum scrap shredder, thermal chip dryer, scrap dryer/delacquering kiln/decoating kiln, group 2 furnace, sweat furnace, dross-only furnace, rotary dross cooler, and secondary aluminum processing unit. The rule also establishes emission standards for dioxins/furans for affected sources, including group 1 furnaces, at secondary aluminum plants that are area sources.

As discussed in section 4, above, Pimalco is an area source for purposes of complying with the maximum achievable control technology standards, as its potential to emit

hazardous air pollutants is less than 25 tpy (see 40 CFR § 63.2 and Table 2, above). Based on Pimalco's status as an area source, Pimalco is not subject to limits on hydrochloric acid (HCl), particulate matter (PM), or total hydrocarbon (THC). These limits will apply if Pimalco becomes a major source of hazardous air pollutants.

Pimalco operates four group 1 furnaces[1] that are subject to the area source requirements of MACT subpart RRR. These furnaces operate without add-on control devices. Pimalco does not operate any other equipment subject to the requirements of Subpart RRR. Appendix A of this Statement of Basis lists the requirements of MACT subpart RRR, and explains the applicability of each provision. The discussion below briefly summarizes how Pimalco complies with the requirements of MACT Subpart RRR.

MACT Subpart RRR requires Pimalco to limit emissions of dioxins and furans to 15 micrograms per megagram of feed/charge. Pimalco complies with the requirements of the MACT standard on a furnace-by-furnace basis, rather than on the basis of a Secondary Aluminum Processing Unit ("SAPU"). This means that, rather than averaging the emissions of the furnaces, each individual furnace must meet the limits of the MACT. If Pimalco wishes to use the SAPU option for complying with the MACT, EPA must be notified, and Pimalco must apply for, and receive, a title V permit modification prior to making the switch (see permit condition III.A.4).

40 CFR §63.1510(b) requires Pimalco to prepare and implement an operation, maintenance, and monitoring (OM&M) plan; this plan was submitted to EPA on March 21, 2003. 40 CFR §63.1510(p) requires a scrap inspection program. EPA approved a site-specific monitoring plan for Pimalco on January 23, 2006 pursuant to the alternative monitoring provisions of 40 CFR §63.1510(w) that contains Pimalco's scrap inspection procedures. These procedures are key to keeping Pimalco's dioxin and furan levels below the emission standard. Among other things, the scrap inspection program requires that Pimalco limit the amount of internally generated scrap chips charged to the furnaces, prohibits Pimalco from charging painted scrap, and requires that staff members who conduct visual scrap inspections receive scrap inspection training and obtain certification, via a written test, at least once every two years.

Pimalco is not subject to MACT subpart RRR's requirements for reactive fluxing. Under MACT subpart RRR, area sources are subject only to requirements that apply to emission units subject to dioxin/furan limits. The only units at Pimalco that are subject to such limits are the Group 1 furnaces. Pimalco does not conduct reactive fluxing[2] in its Group 1 furnaces, and is therefore not subject to the reactive flux requirements. On January 23, 2006, EPA approved Pimalco's request to waive the weight measuring device

1 "Group 1 furnace" is defined in 40 CFR §63.1503 as a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricants, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing.

2 "Reactive fluxing" is defined in 40 CFR §63.1503 as the use of any gas, liquid, or solid flux (other than cover flux) that results in a HAP emission.

requirements of 40 CFR §§ 63.1506(d) and 63.1510(e) on the basis that Pimalco does not use reactive flux in the Group 1 furnaces. If Pimalco wishes to conduct reactive fluxing in the Group 1 furnaces in the future, Pimalco must first notify EPA, obtain a title V revision, and conduct a source test using an approved protocol (see permit condition III.B.1).

In addition to the requirements of MACT Subpart RRR, EPA is also proposing to add the generally applicable requirements of the CFC program under Title VI of the Clean Air Act, as correspondence related to Pimalco's renewal application indicates the presence of equipment that may trigger some of the requirements of Title VI, should Pimalco perform any maintenance, servicing, repair, or disposal of said equipment.

EPA recognizes that, in some cases, sources of air pollution located in Indian country are subject to fewer requirements than similar sources located on land under the jurisdiction of a state or local air pollution control agency. To establish additional applicable, federally-enforceable emission limits, EPA Regional Offices will, as necessary and appropriate, promulgate Federal implementation plans (FIPs) that will establish federal requirements for sources in specific areas. EPA will establish priorities for its direct federal implementation activities by addressing as its highest priority the most serious threats to public health and the environment in Indian country that are not otherwise being adequately addressed. Further, EPA encourages and will work closely with all tribes wishing to develop Tribal Implementation Plans (TIPs). EPA intends that its federal regulations will apply only in those situations in which a tribe does not have an approved TIP. As noted in section 3, above, the Gila River Indian Community is currently in the process of developing an air quality management program which will include a TIP, a part 70 permitting program, and delegation of some NSPS and MACT standards.

6. Periodic Monitoring

As part of EPA's proposal to impose limits on the emissions of hazardous air pollutants (see section 1.g, above), EPA is proposing to add periodic monitoring requirements to the permit to ensure compliance with these limits. To ensure compliance with the limits on hydrogen fluoride, hydrochloric acid, and chlorine, Pimalco will be required to track the use of chlorine, ammonium fluoroborate, and ammonium bi-fluoride, and to calculate usage on a rolling 12-month average basis. Pimalco will also be required to calculate total HAP emissions (HF, HCl, and Cl_2, as well as all other HAP emitted) on a rolling 12-month basis. Pimalco will be required to report usage of Cl_2, AFB, and ABF, as well as total HAP emissions, on a semi-annual basis, per 40 CFR § 71.6(a)(3)(iii)(A).

Because MACT Subpart RRR contains adequate periodic monitoring as part of the standard, EPA is not proposing to add any additional monitoring to the permit for purposes of determining compliance with the MACT, other than the monitoring described above to ensure that Pimalco remains an area source for MACT purposes.

7. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the source and EPA in such determinations.

8. Endangered Species Act

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. § 1536, and its implementing regulations at 50 CFR Part 402, EPA is required to ensure that any action authorized, funded, or carried out by EPA is not likely to jeopardize the continued existence of any Federally-listed endangered species or threatened species or result in the destruction or adverse modification of such species' designated critical habitat. The title V permit renewal that EPA is issuing to Pimalco does not authorize the construction of new emission units, or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. Therefore, EPA has concluded that the issuance of this permit will have no effect on listed species or their critical habitat.

9. Public participation

a. Public Notice

As described in 40 C.F.R. 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 C.F.R. 71(d).

There is a 30-day public comment period for actions pertaining to a draft permit. Public notice will be given for this draft permit by mailing a copy of the notice to the permit applicant, the Gila River Indian Community, the affected state (Arizona), local air pollution control agencies, emergency planning agencies, local government, land use agencies, federal and local land use agencies, and the citizen group "Don't Waste Arizona, Inc." A copy of the notice will also be provided to all persons who have submitted a written request to be included on the mailing list. Public notice will also be published in the Arizona Republic and the Gila River News.

b. Opportunity for Comment

Members of the public may review a copy of the draft permit prepared by EPA, this statement of basis for the draft permit, the application, and all supporting materials submitted by the source at the address listed in section 9.e, below. Copies of the draft permit and statement of basis can also be obtained from EPA's

website (http://www.epa.gov/Region9/air/permit/r9-permits-issued.html), or by contacting Kathleen Stewart at the EPA address or phone number listed in section 9.e, below. All documents will be available for review at the EPA Region IX office indicated in section 9.e, below, during regular business hours.

If you believe that any condition of the draft permit is inappropriate, you must raise all reasonably ascertainable issues and submit all arguments supporting your position during the 30-day public comment period. Any supporting documents must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit or consist of tribal, state or federal statutes or regulations, or other generally available referenced materials.

All comments received during the public comment period and all comments made during any public hearing will be considered in arriving at a final decision on the permit. The final permit is a public record that can be obtained by request. A statement of reasons for changes made to the draft permits and responses to comments received will be sent to all persons who commented on the draft permit.

c. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to Kathleen Stewart, at the address listed in section 9.e, below, by stating the nature of the issues to be raised at the public hearing. EPA shall hold a public hearing if EPA finds, on the basis of requests, a significant amount of public interest in this draft permit. If a public hearing is held, EPA will provide public notice of the hearing and any person may submit oral or written statements and data concerning the draft permit.

d. Mailing List

If you would like to be added to our mailing list to be informed of future actions on this or other Clean Air Act permits issued in Indian Country, please send your name and address to Kathleen Stewart at the address listed below.

e. Contact Information

Kathleen Stewart (AIR-3)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St.
San Francisco, CA 94105
Phone: (415) 947-4119
E-mail: stewart.kathleen@epa.gov

APPENDIX A – MACT SUBPART RRR APPLICABILITY

Citation	Applicable	Reason	Condition #	Page #
63.1500(a)	Yes	Facility is a secondary aluminum production facility	NA	NA
63.1500(b)	No	Not a major source	NA	NA
63.1500(c)	Yes	Is an area source	NA	NA
63.1500(c)(1)	No	No such equipment	NA	NA
63.1500(c)(2)	No	No such equipment	NA	NA
63.1500(c)(3)	No	No such equipment	NA	NA
63.1500(c)(4)	Yes	Pimalco has 4 group 1 furnaces	NA	NA
63.1500(d)	No	Pimalco does not conduct research and development activities	NA	NA
63.1500(e)	Yes	Pimalco is an area source, however the deferral has expired. On December 19, 2005, EPA published a rule permanently exempting area sources at secondary aluminum manufacturing plants from the requirement to obtain title V permits, however, Pimalco is subject to title V permitting requirements for other pollutants.	NA	NA
63.1500(f)	No	Melts other charge	NA	NA
63.1501(a)	Yes	Facility is an existing source	NA	NA
63.1501(b)	No	Facility is not new or reconstructed	NA	NA
63.1501(c)	No	Facility is not new or reconstructed	NA	NA
63.1502	NA	Incorporation by reference	NA	NA
63.1503	NA	Definitions	NA	NA
63.1504	NA	Reserved	NA	NA
63.1505(a)	NA	Summary	NA	NA
63.1505(b)	No	Only applies to major source	NA	NA
63.1505(c)	No	No such equipment	NA	NA
63.1505(d)	No	No such equipment	NA	NA
63.1505(e)	No	No such equipment	NA	NA
63.1505(f)	No	No such equipment	NA	NA
63.1505(g)	No	Only applies to major source	NA	NA
63.1505(h)	No	Only applies to major source	NA	NA
63.1505(i)	Yes	Applies to area sources; source operates group 1 furnaces	NA	NA
63.1505(i)(1)	No	Only applies to major source	NA	NA
63.1505(i)(2)	No	Only applies to major source	NA	NA

Citation	Applicable	Reason	Condition #	Page #
63.1505(i)(3)	Yes	Source operates group 1 furnaces and does not process only clean charge	III.A.1	12
63.1505(i)(4)	No	Only applies to major source	NA	NA
63.1505(i)(5)	No	Only applies to major source	NA	NA
63.1505(i)(6)	No	Source is not using this option	NA	NA
63.1505(i)(7)	No	Source does not operate a sidewell furnace, does not conduct reactive fluxing	NA	NA
63.1505(j)	No	Only applies to major sources	NA	NA
63.1505(k)(1)-(4) and (6)	No	Source does not use the SAPU option	NA	NA
63.1505(k)(5)	Yes	Source is not using the SAPU option	III.A.4	12
63.1506(a)	NA	NA	NA	NA
63.1506(b)	Yes Note, b(3) does not apply because Pimalco does not operate scrap dryers, delaquering kilns, or decoating kilns	Applies to each group 1 furnace	III.B.2	13
63.1506(c)	No	Source does not have add-on air pollution control devices on the furnaces	NA	NA
63.1506(d)	No	Only furnaces are subject to an emission limit. EPA has approved an alternative monitoring plan in place of the requirement to install and operate a weight measuring device, as long as no reactive flux is used. See attached letter, from Douglas K. McDaniel to Amy Vaquez, dated January 23, 2006. Permit will require that source not use reactive flux in the furnaces. (See Condition III.B.1)	NA	NA
63.1506(e)	No	Source does not operate scrap shredders subject to the rule	NA	NA
63.1506(f)	No	Source does not operate thermal chip dryers	NA	NA
63.1506(g)	No	Source does not operate scrap dryers/delaquering kilns/decoating kilns	NA	NA
63.1506(h)	No	Source does not operate sweat furnaces	NA	NA
63.1506(i)	No	Source does not operate dross-only furnaces subject to the rule	NA	NA
63.1506(j)	No	Source does not operate rotary dross coolers subject to the rule	NA	NA
63.1506(k)	No	Only applies to major sources	NA	NA

Citation	Applicable	Reason	Condition #	Page #
63.1506(l)	No	Only applies to major sources	NA	NA
63.1506(m)	No	Source does not operate group 1 furnaces with add-on control devices	NA	NA
63.1506(n)	Yes	Source operates group 1 furnaces without add-on control devices	NA	NA
63.1506(n)(1)	No	Source does not do reactive fluxing in the furnaces	NA	NA
63.1506(n)(2)	Yes	Source operates group 1 furnaces	III.B.3	13
63.1506(n)(3)	No	Source is not subject to emission standards of 63.1505(i)(2)	NA	NA
63.1506(o)	No	Source does not operate any group 2 furnaces	NA	NA
63.1506(p)	Yes	Source operates units subject to this subpart	III.B.4	14
63.1510(a)	NA	Summary	NA	NA
63.1510(b)	Yes	Source has affected units. Pimalco was required to submit an OM&M plan no later than March 24, 2003; their OM&M plan was submitted to EPA on March 21, 2003.	III.C.1	15
63.1510(c)	Yes	Source is required to affix labels to these units	III.C.2	16
63.1510(d)	No	Source does not operate an affected emission unit equipped with an add-on air pollution control device	NA	NA
63.1510(e)	No	Only furnaces are subject to an emission limit. EPA has approved an alternative monitoring plan in place of the requirement to install and operate a weight measuring device, as long as no reactive flux is used. See attached letter, from Douglas K. McDaniel to Amy Vaquez, dated January 23, 2006. Permit will require that source not use reactive flux in the furnaces. (See Condition III.B.1)	NA	NA
63.1510(f)	No	Source does not use fabric filters to comply with subpart RRR	NA	NA
63.1510(g)	No	Source does not use afterburners to comply with Subpart RRR	NA	NA
63.1510(h)	No	Source does not use a lime-injected fabric filter to comply with Subpart RRR	NA	NA
63.1510(i)	No	Source does not use a lime-injected fabric filter to comply with Subpart RRR	NA	NA
63.1510(j)	No	Source does not use reactive fluxing in the furnaces, requirements for in-line fluxers only apply to major sources	NA	NA
63.1510(k)	No	Source does not operate a thermal chip dryer with emissions controlled by an afterburner	NA	NA
63.1510(l)	No	Source does not operate dross-only furnaces subject to the rule	NA	NA
63.1510(m)	No	Only applies to major sources	NA	NA

Citation	Applicable	Reason	Condition #	Page #
63.1510(n)	No	Source does not operate a sidewell furnace, and does not operate add-on pollution control devices	NA	NA
63.1510(o)	Yes	Source operates group 1 furnaces without add-on controls. Pimalco was required to submit a site-specific monitoring plan by January 23, 2003. This plan was submitted on September 20, 2002.	III.C.3	16
63.1510(p)	No	EPA approved an alternate monitoring plan	NA	NA
63.1510(q)	No	Source does not charge scrap with uniform composition	NA	NA
63.1510(r)	No	Source does not operate any group 2 furnaces	NA	NA
63.1510(s)	No	Source does not use SAPU option	NA	NA
63.1510(t)	No	Source does not use SAPU option	NA	NA
63.1510(u)	No	Source does not use SAPU option	NA	NA
63.1510(v)	No	Source does not use lime-coated fabric filters	NA	NA
63.1510(w)	Yes	EPA has approved alternative monitoring. The alternative monitoring plan (AMP) was submitted to EPA on March 21, 2003; EPA approved a revised AMP on January 23, 2006.	III.B.1/III.C.4	13/17
63.1511(a)	Yes	Source is subject to the MACT. EPA approved Pimalco's site-specific test plan on December 1, 2002.	III.C.5	17
63.1511(b)	Yes	Source is subject to the MACT. Pimalco's initial performance test was completed on February 4, 2003.	NA	NA
63.1511(c) and (d)	Yes	Source is subject to the MACT	III.C.5	17
63.1511(e)	No	Only applies to major sources	NA	NA
63.1511(f)	Yes	Optional	III.C.5	17
63.1511(g)	Yes	Applies to an affected source	III.C.5	17
63.1511(h)	No	No control device, not using SAPU	NA	NA
63.1511(i)	No	No control device, not using SAPU	NA	NA
63.1512(a)	No	Source does not operate scrap shredders subject to the rule	NA	NA
63.1512(b)	No	Source does not operate thermal chip dryers	NA	NA
63.1512(c)	No	Source does not operate such equipment	NA	NA
63.1512(d)	No	Source does not operate group 1 furnaces with add-on control devices	NA	NA
63.1512(e)	Yes	Source operates group 1 furnaces without add-on controls	III.C.5	17
63.1512(f)	No	Source does not operate sweat furnaces	NA	NA
63.1512(g)	No	Source does not operate dross-only furnaces subject to the rule	NA	NA

Citation	Applicable	Reason	Condition #	Page #
63.1512(h)	No	Only applies to major sources	NA	NA
63.1512(i)	No	Source does not operate rotary dross coolers subject to the rule	NA	NA
63.1512(j)	No	Source does not use SAPU option	NA	NA
63.1512(k)	Yes	Source is subject to emission limit in ug/Mg (kg/Mg) format	III.C.5	17
63.1512(l)	No	Source does not use or need to use a COMs	NA	NA
63.1512(m)	No	Source does not use afterburners to comply with Subpart RRR	NA	NA
63.1512(n)	No	Source does not use a lime-injected fabric filter	NA	NA
63.1512(o)	No	Source does not do reactive fluxing in the furnaces, requirements for in-line fluxers only apply to major sources	NA	NA
63.1512(p)	No	Source does not use a lime-injected fabric filter system	NA	NA
63.1512(q)	No	Source does not use a bag leak detection system	NA	NA
63.1512(r)	Yes	Source operates a group 1 furnace	III.E.6	20
63.1512(s)	No	No add-on air pollution control devices	NA	NA
63.1513(a)	No	Not subject to a THC limit	NA	NA
63.1513(b)	Yes	Subject to D/F limits	III.A.2	12
63.1513(c)	No	Source is not subject to HCl reduction standard	NA	NA
63.1513(d)	Yes	Source is subject to D/F TEQ limit	III.A.3	12
63.1513(e)	No	Source does not use SAPU option	NA	NA
63 .1515(a)(1)	Yes	Source is currently area source	III.E.1	19
63.1515(a)(2)-(5)	Yes	Source may reconstruct	III.E.2	19
63.1515(a)(6)	Yes	Source is required to conduct performance tests	III.E.3	19
63.1515(a)(7)	No	Source does not operate CEMs or COMs	NA	NA
63.1515(b)	Yes	Affected source. Pimalco was required to submit a notification of compliance status report by May 23, 2003. This report was submitted on May 12, 2003.	NA	NA
63.1516(a)	Yes	Affected source	III.E.4	19
63.1516(b)	Yes	Affected source	III.E.5	19
63.1516(c)	Yes	Source is affected source	III.E.7	20
63.1517(a)(1)	Yes	Source is affected source	III.D.1	18
63.1517(a)(2) & (3)	Yes	Source is required to maintain files	III.D.2	18
63.1517(b)	See below	See below	See below	

Citation	Applicable	Reason	Condition #	Page #
63.1517(b)(1)	No	Source does not use fabric filters	NA	NA
63.1517(b)(2)	No	Source does not use afterburners to comply with Subpart RRR	NA	NA
63.1517(b)(3)	No	Source does not use lime-injected fabric filters	NA	NA
63.1517(b)(4)	No	Source does not use lime-injected fabric filters	NA	NA
63.1517(b)(5)	No	Source does not do reactive fluxing in the furnaces, requirements for in-line fluxers only apply to major sources	NA	NA
63.1517(b)(6)	No	Source does not operate CEMs	NA	NA
63.1517(b)(7)	Yes	Source subject to ug/Mg limit	III.D.3	18
63.1517(b)(8)	Yes	Source operates a group 1 furnace without add-on controls	III.D.3	18
63.1517(b)(9)	No	Source does not operate thermal chip dryers, dross-only furnaces, and group 1 furnaces w/out air pollution control devices processing only clean charge	NA	NA
63.1517(b)(10)	No	Source does not operate group 1 sidewell furnace with add-on air pollution control devices	NA	NA
63.1517(b)(11)	No	Only applies to major sources	NA	NA
63.1517(b)(12)	No	Source does not operate group 2 furnaces	NA	NA
63.1517(b)(13)	Yes	Units are subject to labeling requirements	III.D.3	18
63.1517(b)(14)	No	Source does not have capture/collection or closed vent systems	NA	NA
63.1517(b)(15)	Yes	Source may apply for alternative monitoring plans	III.D.3	18
63.1517(b)(16)	Yes	Affected source	III.D.3	18
63.1517(b)(17)	No	Source does not use SAPU option	NA	NA