ADEQ

A R K A N S A S
Department of Environmental Quality

October 11, 2012

Vernon L. Pate
Corporate Environmental Manager
Superior Industries International Arkansas, LLC
1901 Borick Drive
Fayetteville, AR 72701

Re: Notice of Administrative Amendment
AFIN: 72-00270, Permit No.: 1302-AOP-R18

Dear Mr. Pate:

Enclosed is Permit 1302-AOP-R18 completed in accordance with the provisions of Section 26.901 of Regulation No. 26, *Regulations of the Arkansas Operating Air Permit Program.*

This administrative amendment adds a Riser Tube Oven, a Casting Mold Pre-Heat Oven, 3 Mold Shop Mold Ovens, a Ladle Heater, and a Line #1 Clear Coat Oven Tunnel Exhaust as insignificant activities. Additionally, the Sand Blast Unit (SN-134) is being replaced by a similar unit.

Please place the revised permit in your files.

Sincerely,

Mike Bates
Chief, Air Division

*alex*
Enclosure

# ADEQ
# OPERATING
# AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 1302-AOP-R18

IS ISSUED TO:

Superior Industries International Arkansas, LLC
1901 Borick Drive
Fayetteville, AR 72701
Washington County
AFIN: 72-00270

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

July 6, 2010 AND July 5, 2015

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Mike Bates
Chief, Air Division

October 11, 2012
Date

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List of Acronyms and Abbreviations

| | |
|---|---|
| A.C.A. | Arkansas Code Annotated |
| AFIN | ADEQ Facility Identification Number |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| HAP | Hazardous Air Pollutant |
| lb/hr | Pound Per Hour |
| MVAC | Motor Vehicle Air Conditioner |
| No. | Number |
| $NO_x$ | Nitrogen Oxide |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate Matter Smaller Than Ten Microns |
| SNAP | Significant New Alternatives Program (SNAP) |
| $SO_2$ | Sulfur Dioxide |
| SSM | Startup, Shutdown, and Malfunction Plan |
| Tpy | Tons Per Year |
| UTM | Universal Transverse Mercator |
| VOC | Volatile Organic Compound |

## SECTION I: FACILITY INFORMATION

| | |
|---|---|
| PERMITTEE: | Superior Industries International Arkansas, LLC |
| AFIN: | 72-00270 |
| PERMIT NUMBER: | 1302-AOP-R18 |
| FACILITY ADDRESS: | 1901 Borick Drive<br>Fayetteville, AR 72701 |
| MAILING ADDRESS: | 1901 Borick Drive<br>Fayetteville, AR 72701 |
| COUNTY: | Washington County |
| CONTACT NAME: | Vernon L. Pate |
| CONTACT POSITION: | Corporate Environmental Manager |
| TELEPHONE NUMBER: | 479-695-2531 |
| REVIEWING ENGINEER: | Alexander Sudibjo |
| UTM North South (Y): | Zone 15: 3988151.96 m |
| UTM East West (X): | Zone 15: 397938.22 m |

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Superior Industries International Arkansas, LLC (Superior) owns and operates an OEM aluminum wheel manufacturing facility located at 1901 East Borick Drive Washington County Fayetteville, Arkansas 72701. This administrative amendment adds a Riser Tube Oven, a Casting Mold Pre-Heat Oven, 3 Mold Shop Mold Ovens, a Ladle Heater, and a Line #1 Clear Coat Oven Tunnel Exhaust as insignificant activities. Additionally, the Sand Blast Unit (SN-134) is being replaced by a similar unit.

### Process Description

**WHEEL CASTING PLANT**

CASTING OPERATION:

Raw material (aluminum ingots, clean charge only) is melted in gas-fired furnaces rated at 8,000 lb to 10,000 lb of molten metal (SN-03, SN-123a, SN-128a, SN-137, & SN-142). During melting operations, the molten metal receives flux to control oxidation, etc., (SN-04, SN-123b, SN-128b, SN-137, & SN-143).

Clean, dry aluminum chips are reclaimed from our machining operations and are added to the furnaces by the chip wells (SN-13, SN-15, & SN-144.) During melting process, the molten metal receives flux to control oxidation.

MACHINING OPERATION:

The center hole in the rim is cut during this operation. No air emissions are associated with this operation.

INSPECTION:

The wheel is inspected for casting defects during this operation. No air emissions are associated with this operation.

HEAT TREAT OPERATION:

The wheel is heat-treated for improved mechanical properties in gas-fired heat-treat ovens (SN-21, SN-22, SN-23, SN-24a, SN-24b & SN-126a). After the wheels leave the oven, they are quenched in large temperature controlled tanks (SN-25, SN-26 & SN-126b).

WHEELABRATING OPERATION:

This operation shot peens the wheel. (See IA-13 List)

PAINTING:

First the wheel is cleaned in a power washer and sent through a pretreatment process. The wheels are then dried in an oven (SN-32 & SN-33) and painted (SN-34, SN-35, SN-

64, SN-65, & SN-140). The paint is then cured in an oven (SN-38, SN-130, SN-131, & SN-132). Heat for the painting area is provided by a 7.5 MMBtu/hr boiler (SN-124).

AGEING OPERATION:

Some wheels require additional heat treating or ageing this occurs in the overhead age oven (SN-127).

MACHINING OPERATION:

All finished machining work is done on the wheel during this operation.

PAINTING (CLEAR COAT):

The wheel is cleaned in a power washer and pretreated in dip tanks. Some of the stages in the power washer and some of the dip tanks are heated by steam provided from a 9.4 MMBtu/hr boiler (SN-48 & SN-49). The wheel is then dried in an oven (SN-46 & SN-47). The wheel is then clear coated (IA-13 List) in clear coat powder booths. A backup boiler (SN-125), 9.4 MMBtu/hr, supplies heat for the clear coat when needed.

INSPECT & PACKAGE:

The final operation performed on the wheel is inspection and packaging for shipment to the customer. This operation has no air emissions associated with it.

The following are secondary operations used to support and/or make the processes used more economically efficient.

CHIP RECOVERY SYSEM:

Chips from both machining operations are collected in a central chip recovery system. This system has stacks numbered SN-16 & SN-18.

MOLD MAINTENANCE:

The molds are cleaned in heated dip tanks (SN-62, & SN-63) prior to repairs being made.

HANGER MAINTENANCE:

Excess coatings are removed from the wheel conveyor hangers by a fluidized sand bed burn off oven (SN-138).

GAS FIRED CHILLER:

A natural gas fired chiller provides localized cooling for the employees working on the casting deck and the machine shop (SN-51a & SN-129).

**BRIGHT POLISH OPERATIONS**

Wheels are received from the finished machining operations in a number of plants and sent to the Bright Polishing Operations.

CLEAN & AGE: (Inactive Operation)

The wheels are cleaned in a power washer (SN-70) and aged in an overhead gas fired oven (SN-31).

POLISHING OPERATIONS:

The wheels are polished to a bright finish prior to being clear coated. Dust generated during these polishing operations is collected in a central dust collection unit (SN-82, SN-109, SN-116, SN-121, & SN-122).

CLEANING OPERATION:

The wheels are transferred from the polishing operation via an overhead conveyor through a dip tank and power washer for cleaning prior to being sent to the casting plant clear coat line. The dip tank is heated by a 6.3 MMBtu/hr boiler (SN-106) and the wheels are dried off with the dry off oven (SN-107).

PAINTING (CLEAR COAT):

A Clear coating operation in the Bright Polish operations is inactive at this time (SN-108 Cure Oven). A paint booth (SN-141) is used to paint selected wheel styles for cladding purposes. Bright Polished wheels are transferred to the Casting Plant for Clear coating.

Appendix A contains a listing of sources removed from service.

## Regulations

The following table contains the regulations applicable to this permit.

| Regulations |
|---|
| Arkansas Air Pollution Control Code, Regulation 18, effective June 18, 2010 |
| Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective July 9, 2012 |
| Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective July 9, 2012 |

Paint used in SN-34, 35, 64, 65, 140 and 141 is HAP-free, Specific Condition #12. 40 CFR 63 – Subpart MMMM – NESHAP: *Surface Coating of Miscellaneous Metal Parts and Products* is not applicable. Boilers, SN-124 and SN-125, are rated less than 10 MMBtu/hr and thus 40 CFR 60, Subpart Dc is not applicable. Superior is not subject to 40 CFR 63, Subpart RRR; it uses only internal scrap aluminum.

## Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| Total Allowable Emissions | | PM | 24.5 | 97.3 |
| | | $PM_{10}$ | 12.5 | 44.7 |
| | | $SO_2$ | 3.8 | 3.8 |
| | | VOC | 49.7 | 151.2 |
| | | CO | 21.7 | 87.5 |
| | | $NO_X$ | 23.2 | 97.8 |
| HAPs* | | $HCl^1$ | 5.28 | 23.15 |
| | | $HF^1$ | 0.81 | 3.50 |
| Air Contaminants ** | | Acetone | 4.8 | 19.0 |
| | | $PCBTF^2$ | 23.2 | 92.6 |
| 03, 21, 22, 23, 24A, 24B, 25, 26, 31, 32, 33, 38, 46, 47, 48/49, 51A, 62, 63, 70, 106, 107, 108, 123A, 124, 125, 126A, 126B, 127, 128A, 129, 130, 131, 132, 136, and 142 | Combustion Emissions of these Natural Gas-Fired Equipment | PM | 4.0 | 9.0 |
| | | $PM_{10}$ | 4.0 | 9.0 |
| | | $SO_2$ | 3.5 | 3.5 |
| | | VOC | 3.7 | 7.1 |
| | | CO | 20.9 | 84.8 |
| | | $NO_X$ | 22.4 | 94.7 |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| 04 and 13 | Flux Hood (04) and Chip Well (13) (Melt Furnace #2) | PM<br>$PM_{10}$<br>HCl[1]<br>HF[1] | 2.0<br>1.2<br>1.75<br>0.26 | 8.8<br>5.3<br>7.67<br>1.14 |
| 137 and 15 | Flux Hood (137) and Chip Well (15) (Melt Furnace #4) | PM<br>$PM_{10}$<br>HCl[1]<br>HF[1] | 2.0<br>1.2<br>1.75<br>0.26 | 8.8<br>5.3<br>7.67<br>1.14 |
| 123B | Flux Hood (Melt Furnace #1) | PM<br>$PM_{10}$<br>HCl[1]<br>HF[1] | 1.6<br>1.0<br>0.19<br>0.04 | 7.1<br>4.2<br>0.84<br>0.15 |
| 128B | Flux Hood (Melt Furnace #5) | PM<br>$PM_{10}$<br>HCl[1]<br>HF[1] | 1.6<br>1.0<br>0.19<br>0.04 | 7.1<br>4.2<br>0.84<br>0.15 |
| 143 and 144 | Flux Hood (143) and Chip Well (144) (Melt Furnace #3) | PM<br>$PM_{10}$<br>HCl[1]<br>HF[1] | 1.6<br>1.0<br>1.40<br>0.21 | 7.1<br>4.2<br>6.13<br>0.92 |
| 34, 35, 64, 65, 140, and 141 | Six (6) Paint Booths (HAP-Free paint only) | VOC<br>Acetone**<br>PCBTF**[2] | 40.8<br>4.8<br>23.2 | 122.4<br>19.0<br>92.6 |
| 16, 18A, and 18B | Chip Recovery System Boiler, Cyclone & Coolant Emissions (natural gas, 2.5 MMBTU/hr, installed 1999 & 2.8 MMBTU/hr) (HAP-free coolant) | PM<br>$PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_X$ | 0.2<br>0.2<br>0.2<br>5.1<br>0.6<br>0.6 | 0.2<br>0.2<br>0.2<br>21.6<br>2.1<br>2.4 |
| 82, 109, 116, 121, and 122 | Polishing Operation (Seven Polishers with Five Dust Collectors) | PM<br>$PM_{10}$ | 10.2<br>1.6 | 43.7<br>6.8 |
| 138 | Fluidized Bed Burn-off Oven (natural gas, 1.5 MMBtu/hr and residual paint with 98.9% cyclone eff) | PM<br>$PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_X$ | 1.3<br>1.3<br>0.1<br>0.1<br>0.2<br>0.2 | 5.5<br>5.5<br>0.1<br>0.1<br>0.6<br>0.7 |

| EMISSION SUMMARY | | | | |
|---|---|---|---|---|
| Source Number | Description | Pollutant | Emission Rates | |
| | | | lb/hr | tpy |
| 17, 19, 20, 41-44, 66-68, 78, 100, 101, 134A, 134B, 135, and 139 | Insignificant Activities that were formerly sources. | | | |

[1]HCl – Hydrochloric Acid. HF – Hydrogen Fluoride. HCl and HF are not VOCs and are not included in the VOCs; they are HAPs only.
[2]PCBTF - Parachlorobenzotrifluoride
*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.
**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

## SECTION III: PERMIT HISTORY

Permit #1302-A was the first air permit issued to the facility on April 4, 1994. This permitting action allowed the melting of aluminum ingots and chips; fluxing of molten aluminum to remove impurities; casting cooling, machining, and painting to manufacture custom wheels.

Permit #1302-AR-1 was issued to the facility on November 18, 1994. This permitting action incorporated seven (7) new sources of emissions due to construction of a plating plant to be used in conjunction with the previously (Permit #1302-A) permitted sources.

Permit #1302-AOP-R0 was the first Title V permit issued on October 18, 1999 and established Superior Industries as a major source due to VOC and HAP emissions. This permitting action incorporated the addition of a bright polishing and ink stamping operation.

Permit #1302-AOP-R1 was issued to the facility on January 23, 2001. It allowed the facility to construct and operate a 0.4 MMBtu/hr sludge dryer (SN-120) for increased drying capacity in the waste treatment operation.

Permit #1302-AOP-R2 was issued on September 18, 2001. This modification allowed the facility to change the opacity limits for Source Numbers 02, 04, 06, 08, 10, 12-15, 83-94, 82, 109, and 116 in Specific Conditions 9, 23, and 43 from 20 percent opacity to 10 percent opacity. The corresponding opacity observation requirements have been changed from daily to weekly. Also, the following sources were removed from the permit Sprue Furnace (SN-61), Crucible Furnaces (SNs 117-118), and Chip Well Exhaust (SN 59). The following activity was reclassified as insignificant Wheel-a-brator Shot Blast (SNs 41 44). The facility also replaced the #2 4500 lb Melt Furnace, #2 4500 lb Furnace Flux Hood Exhaust, Chip Well Exhaust Stack, and Mold Cleaning Tank Heater Tube Exhausts at SNs 03, 04, 13, 50, 62, and 63. The permitted increase in emissions was less than 0.5 tpy for each affected pollutant.

Permit #1302-AOP-R3 was issued February 21, 2002. This modification included the addition of a mechanical dust collector (SN-121) in the polishing operations, modification of the monitoring requirements of 40 CFR 60 Subpart Dc for natural gas usage for the natural gas fired boiler (SN-56), and the Ink Transfer Operation (formerly SN-111) was changed to an insignificant activity. The permitted increase in emissions was 22.4 tpy PM.

Permit No. 1302-AOP-R4 was issued to Superior Industries International, Inc. on February 12, 2002. The modification was issued for the addition of the Mechanical Dust Collector (SN-122) to the Polishing Operations. This resulted in an increase of particulate matter emissions: 8.2 tpy.

Permit No. 1302-AOP-R5 was issued to Superior Industries International, Inc. on October 21, 2002. The modification authorized the addition of 4 new sources (SN-123a through SN-125) and the removal of 10 sources: SN-01, 02, 09, 10, 11, 12, 27, 28, 29 and 30. Permit limits for criteria pollutants were: PM/PM10 – 77.2 tpy, $SO_2$ – 0.5 tpy, VOC – 178.0 tpy, CO – 65.4 tpy, and NOx – 74.9 tpy.

Permit No. 1302-AOP-R6 was issued to Superior Industries International, Inc. on June 30, 2003. This modification authorized a facility expansion. Permit limits for criteria pollutants were: PM/PM10 – 79.9 tpy, SO2 – 1.0 tpy, VOC – 179.5 tpy, CO – 83.3 tpy, and NOx – 82.5 tpy.

Permit No. 1302-AOP-R7 was issued to Superior Industries International, Inc. on September 30, 2003. This modification authorized a facility expansion. Permit limits for pollutants were: PM/PM10 – 80.0 tpy, SO2 – 1.0 tpy, VOC – 179.6 tpy, CO – 85.1 tpy, and NOx – 80.7 tpy.

Permit No. 1302-AOP-R8 was issued to Superior Industries International, Inc. on May 11, 2004. This modification authorized part of the painting processes being changed to powder paint. SN-51 was replaced with SN-51A. Permit limits for criteria pollutants were: PM/PM10 – 80.0 tpy, SO2 – 1.1 tpy, VOC – 133.0 tpy, CO – 85.1 tpy, and NOx – 80.7 tpy.

Permit No. 1302-AOP-R9 was issued to Superior Industries International, Inc. on November 5, 2004 as Renewal #1. There were no changes to the actual emissions or the processes with the issuance of this permit renewal. All emission limits were recalculated and some emission limits were adjusted based on newer emission factors. The wheel painting equipment (SN-34, 35, 64, 65, 72 and 73) was permitted below 10 tons per year (tpy) of any one Hazardous Air Pollutant (HAP) and below 25 tpy of any combination of HAPs. This was below the applicability threshold for 40 CFR 63 – Subpart MMMM: *Surface Coating of Miscellaneous Metal Parts and Products*. If at some point in the future, the facility proposes to exceed the applicability threshold, an application detailing compliance with this subpart must be submitted in a timely manner per the regulation for ADEQ consideration.

Permit No. 1302-AOP-R10 was issued to Superior Industries International, Inc. on April 17, 2006. The two main processes that occur in this facility are wheel casting and chrome plating. This permit minor modification was issued to allow the permittee to replace two burn-off ovens, SN-45 and SN-60, with a fluidized bed burn-off oven, SN-138. The proposed changes result in emission increases of 5.3 ton per year (tpy) of PM/PM10, 0.2 tpy of CO, and 0.3 tpy of NO.

Permit No. 1302-AOP-R11 was issued to Superior Industries International, Inc. to allow the removal of the chrome and nickel plating operation which consists of the following: Chrome and Nitric Acid Bearing Exhausts (SN-52 & 53), General Acid/Alkali Exhausts (SN-54 & 55), Power Coat Mist Collection Units (SN-83, 84, 87, 92 & 94) and Nickel and Copper Plating Baths (SN-112 & 113). Removal of the chrome and nickel plating operation will result in elimination of 9.5 tpy HAPs emissions, chrome and nickel emissions, and air contaminant emissions, and the facility will no longer be subject to 40 CFR 63, Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Additional specific sources that were removed include: natural gas-fired equipment SN-57, 58, 75, 76, 77, 81 & 120; and SN-06, 14, 56, 72, 73 & 74.

- Permit No. 1302-AOP-R11 was administratively amended on October 13, 2008 to correct a typographical error. Three back-up emergency, diesel-fired generators (IA) were mistakenly permitted as natural gas-fired. There were no increases in emissions in this permit. Additionally, the summary of emissions from the prior permit was corrected.

Potential annual emissions are: 174.2 tpy PM, 174.2 tpy $PM_{10}$, 4.8 tpy $SO_2$, 120.3 tpy VOC, 80.6 tpy CO, 91.4 tpy $NO_X$, and 2.3 tpy Hydrochloric Acid.

Permit No. 1302-AOP-R12 was issued to Superior Industries International, Inc. on August 27, 2009. This permit modification was necessary to:

1. Re-designate Melt Furnaces (MF) #2 (SN-03) and #4 (SN-136), as Group 1 furnaces w/o add-on control devices, located at a SAPU to melt, hold or process aluminum scrap from an outside vendor, not internal scrap. The first day Superior begins processing outside vendor Al scrap , it will be subject to 40 CFR 63.1500, Subpart RRR, NESHAP;
2. Prepare, implement and keep updated OM&M Plan in SC #11;
3. Permit not to exceed 43,800 tons secondary Al and 87,600 tons total Al charge combined and 13,140 lbs of MP-355 and 52,560 lbs of MP-375 Flux each per consecutive twelve months in MF #2 and #4 (SN-03 and 136);
4. Remove from service: MF #3 (SN-05); Mist Collectors (SN-88, 89, 91 and 93); and Cooling Ring Acid Bath (SN-50);
5. Correct heat capacities (MMBtu/hr) for natural gas-fired equipment: SN-03, 16, 18, 24A, 24B, 31, 46, 47, 63, 70, 106, 107, 108, 123A, 125, 126A, 126B, 127, 128A, 132 and 139;
6. Remove Boilers SN-124 and 125 from applicability of 40 CFR 60 , Subpart Dc;
7. Consolidate weekly visibility observation facility-wide with PWC #11;
8. Add continuous opacity monitoring for SN-03, 04 and 13 and for SN-136, 137 and 15;
9. Specify the VOC and HAP lb/gal limits for paint, SC #32;
10. Specify the VOC and HAP lb/gal limits for SN-100 (Mold Coating) and SN-101 (QA/QC), SC #36 and #40, respectively;
11. Revise emissions for Miscellaneous Natural Gas Fired Equipment (SN-139); and
12. Remove from service the following IAs: Aqueous Parts Washing Vents (formerly SN-79, 80, 95, 96 and 99), Bright Polish Paint Booth (formerly SN-105), Ink Transfer Op (formerly SN-111), Clear Coat Touch-Up Booth (formerly SN-114 and 119), Powder Coat Paint Booth (formerly SN-133) and Two Electric Infrared Ovens.

Total permitted annual emission rate changes associated with this modification include: –11.3 tpy $PM/PM_{10}$, –1.0 tpy $SO_2$, –1.3 tpy VOC, 2.3 tpy CO, –0.5 tpy $NO_X$, 4.6 tpy HCl, 0.76 tpy HF, and $2.3x10^{-7}$ tpy D/F TEQ

Permit No. 1302-AOP-R13 Renewal #2 was issued to Superior Industries International Arkansas, Inc. on July 6, 2010. This permit modification was necessary to: Renew Title V permit; Update (reduce) $PM_{10}$ emission factor limit for fluxing (SN-04/13, 137/15, 123B and 128B) to 60% of PM emission factor based on AP-42; Update annual aluminum charge for SN-03, 136, 123A and 128A –Melt Furnaces; Update annual flux limit for SN-04/13, 15/137 123B and128B – Fluxing Operations; Add HCl and HF emissions due to flux charge for SN-137/15, 123B and 128B; Update (reduce) $PM_{10}$ emission factor for Polishing Operation (SN-82, 109, 116, 121 and 122) to 15% of PM emission factor based on AP-42; Add Spray Paint Booth (SN-140) to Painting Operation; Remove miscellaneous natural gas-fired equipment (SN-139), Mold Coating (SN-100) and QA/QC Paint Shot (SN-101) as sources and add to Insignificant Activities (IA); Increase permitted annual flux limit for Melt Furnace #2 (SN-03) and #4 (SN-136); Add

Chip Recovery Coolant Emissions (SN-18B); and Remove 40 CFR 63, Subpart RRR requirements from permit. Superior processes only clean charge and in-house scrap aluminum. Total permitted annual emission increases and decreases associated with these modifications are: –73.3 tpy PM, –123.0 tpy $PM_{10}$, –0.1 tpy $SO_2$, –8.3 tpy VOC, –1.3 tpy CO, –0.1 tpy $NO_X$, 11.92 tpy HCl, 1.82 tpy HF and –2.3E-07 Dioxin/Furan TEQ. Total permitted annual emission rates for this permit renewal are: 89.6 tpy PM, 39.9 tpy $PM_{10}$, 3.7 tpy $SO_2$, 110.7 tpy VOC, 81.6 tpy CO, 90.8 tpy $NO_X$, 17.02 tpy HCl and 2.58 tpy HF.

Permit No 1302-AOP-R14 was issued on November 23, 2010. This permit modification was necessary to: Specify an equivalent to MP-355 flux which shall not emit more than 254.33 lbs HCl and 43.64 lbs HF per ton flux at a maximum of 40% volatilization factor and conversion of F and Cl in the salts to HF and HCl, Specific Condition (SC) #8; Specify an equivalent to MP-375 flux which shall not emit more than 450.58 lbs HCl and 65.45 lbs HF per ton flux at a maximum of 40% volatilization factor and conversion of F and Cl in the salts to HF and HCl, SC #9; Update coolant at SN-18B to contain VOCs not to exceed 1.5 percent by volume as applied, SC #19. Total permitted annual emission change associated with this modification was: 19.7 tons per year (tpy) VOC.

Permit No. 1302-AOP-R15 was issued on May 9, 2011. This permit action was necessary to add an additional source - SN-141 Spray Paint Booth – Clad Line. Total permitted annual emission change associated with this modification was: 20.4 tons per year (tpy) VOC.

Permit No. 1302-AOP-R16 was issued on December 19, 2011. This permit modification was necessary to specify the non-VOC air contaminants for paint used in Paint Booths SN-34, SN-35, SN-64, SN-65, SN-140 and SN-141. Total permitted annual emission increases associated with this modification were: 92.6 tpy Parachlorobenzotrifluoride (PCBTF) and 19.0 tpy Acetone.

Permit No. 1302-AOP-R17 was issued on June 20, 2012. This minor mod modification added Melt Furnace #3 (SN-142), Melt Furnace Flux Hood #3 (SN-143) and Melt Furnace Chip Well #3 (SN-144) as new permitted sources. Permitted emissions were increased by 7.7 tpy, 4.8 tpy, 0.1 tpy, 0.4 tpy, 5.9 tpy, 7.0 tpy, 6.13 tpy, and 0.92 tpy for PM, $PM_{10}$, $SO_2$, VOC, CO, $NO_x$, HCl, and HF respectively.

## SECTION IV: SPECIFIC CONDITIONS

SN-03, 21-23, 24A/B, 25, 26, 31-33, 38, 46-49, 51A, 62, 63, 70, 106-108, 123A, 124, 125, 126A/B, 127, 128A, 129-132, 136, and 142– Combustion Emissions Natural Gas-fired Equipment

### Source Description

Wheel Casting Plant:
Initially during the casting operation, raw material (aluminum ingots and internally generated aluminum scrap) is melted in five (5) natural gas-fired furnaces (SN-03, 136, 123A, 128A, and 142). During the heat treat operation, the wheel is heat treated for improved mechanical properties in natural gas-fired heat treat ovens (SN-21, 22, 23, 24A, 24B and 126A). After the wheels leave the oven, they are quenched in a large temperature controlled tank (SN-126B). Prior to painting, the wheel is cleaned in a power washer (Insignificant Activity, formerly SN-66 and 67). The wheels are then dried in an oven (SN-32 and 33), painted and cured in an oven (SN-38). Some of the dip tanks are heated by steam provided from a boiler (SN-48/49). The wheel is then dried in an oven (SN-46 and 47). During mold maintenance, the molds are cleaned in heated dip tanks (SN-62 and 63) prior to repairs being made.

### Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel (Plantwide Condition #7) and by operating at or less than maximum capacity. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 03 | Melt Furnace #2<br>10,000 lb/hr Aluminum Charge<br>Internal Scrap & Clean AL Only<br>(natural gas, 16.0 MMBtu/hr,<br>installed 2000) | $PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_X$ | 0.2<br>0.1<br>0.1<br>1.4<br>1.6 | 0.6<br>0.1<br>0.4<br>5.9<br>7.1 |
| 21 | Solution Heat Treat #1<br>(natural gas, 3.0 MMBtu/hr,<br>low $NO_X$ burners) | $PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_X$ | 0.1<br>0.1<br>0.1<br>0.3<br>0.2 | 0.1<br>0.1<br>0.1<br>1.2<br>0.7 |
| 22 | Solution Heat Treat #2<br>(natural gas, 3.0 MMBtu/hr,<br>low $NO_X$ burners) | $PM_{10}$<br>$SO_2$<br>VOC<br>CO<br>$NO_X$ | 0.1<br>0.1<br>0.1<br>0.3<br>0.2 | 0.1<br>0.1<br>0.1<br>1.2<br>0.7 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 23 | Solution Heat Treat #3 (natural gas, 3.0 MMBtu/hr, low $NO_X$ burners) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.2 |
| | | $NO_X$ | 0.2 | 0.7 |
| 24A | Solution Heat Treat #4 (natural gas, 6.6 MMBtu/hr, low $NO_X$ burners, vent 1 of 2) | $PM_{10}$ | 0.1 | 0.3 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.6 | 2.5 |
| | | $NO_X$ | 0.4 | 1.5 |
| 24B | Solution Heat Treat #4 (natural gas, 0.9 MMBtu/hr, low $NO_X$ burners, vent 2 of 2) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.1 | 0.4 |
| | | $NO_X$ | 0.1 | 0.2 |
| 25 | Heat Treat Boilers #3 & #4 (natural gas, 2.7 MMBtu/hr, installed 2007) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.2 |
| 26 | Heat Treat Boilers #1 & #2 (natural gas, 2.7 MMBtu/hr, installed 2007) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.2 |
| 31 | Overhead Age Oven #1 (natural gas, 3.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.2 |
| | | $NO_X$ | 0.3 | 1.4 |
| 32 | Dry-off Oven – Paint #1 (natural gas, 1.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.2 | 0.6 |
| | | $NO_X$ | 0.2 | 0.7 |
| 33 | Dry-off Oven – Paint #2 (natural gas, 1.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.2 | 0.6 |
| | | $NO_X$ | 0.2 | 0.7 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 38 | Paint Cure Oven #3 (natural gas, 2.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.1 |
| 46 | Cure Oven Exhaust – Clear Coat #1(natural gas, 5.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.5 | 1.9 |
| | | $NO_X$ | 0.5 | 2.2 |
| 47 | Cure Oven Exhaust – Clear Coat #2 (natural gas, 6.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.6 | 2.3 |
| | | $NO_X$ | 0.6 | 2.7 |
| 48/49 | Clear Coat Boiler #1 (natural gas, 9.4 MMBtu/hr, installed 2000) | $PM_{10}$ | 0.1 | 0.4 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.3 |
| | | CO | 0.8 | 3.5 |
| | | $NO_X$ | 1.0 | 4.2 |
| 51A | Chiller Boiler #1 (natural gas, 6.0 MMBtu/hr, installed 2004) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.6 | 2.3 |
| | | $NO_X$ | 0.6 | 2.7 |
| 62 | Caustic Tank Heater #1 (natural gas, 0.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.1 | 0.2 |
| | | $NO_X$ | 0.1 | 0.3 |
| 63 | Caustic Tank Heater #2 (natural gas, 1.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.1 | 0.4 |
| | | $NO_X$ | 0.1 | 0.5 |
| 70 | 2-Stage Washer Heater (natural gas, 1.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.1 | 0.4 |
| | | $NO_X$ | 0.1 | 0.5 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 106 | Bright Polish Boiler (natural gas, 6.3 MMBtu/hr, installed 1998) | $PM_{10}$ | 0.1 | 0.3 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.6 | 2.4 |
| | | $NO_X$ | 0.7 | 2.8 |
| 107 | Bright Polish Dry-off Oven (natural gas, 5.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.5 | 1.9 |
| | | $NO_X$ | 0.5 | 2.2 |
| 108 | Bright Polish Clear Coat Oven (natural gas, 5.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.5 | 1.9 |
| | | $NO_X$ | 0.5 | 2.2 |
| 123A | Melt Furnace #1 8,000 lb/hr Aluminum Charge Internal Scrap & Clean AL Only (natural gas, 24.4 MMBtu/hr, installed 2002) | $PM_{10}$ | 0.2 | 0.9 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.2 | 0.6 |
| | | CO | 2.1 | 9.0 |
| | | $NO_X$ | 2.5 | 10.7 |
| 124 | Paint Room Boiler (natural gas, 7.5 MMBtu/hr, installed 2002) | $PM_{10}$ | 0.1 | 0.3 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.7 | 2.8 |
| | | $NO_X$ | 0.8 | 3.3 |
| 125 | Clear Coat Back-up Boiler (natural gas, 9.4 MMBtu/hr, installed 2002) | $PM_{10}$ | 0.1 | 0.4 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.3 |
| | | CO | 0.8 | 3.5 |
| | | $NO_X$ | 1.0 | 4.2 |
| 126A | Solution Heat Treat #5 (natural gas, 9.0 MMBtu/hr, low $NO_X$ burners) | $PM_{10}$ | 0.1 | 0.3 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.3 |
| | | CO | 0.8 | 3.4 |
| | | $NO_X$ | 0.5 | 2.0 |
| 126B | Quench Tank Heater HT #5 (natural gas, 2.7 MMBtuhr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.2 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 127 | Overhead Age Oven #2 (natural gas, 9.0 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.3 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.3 |
| | | CO | 0.8 | 3.4 |
| | | $NO_X$ | 0.9 | 4.0 |
| 128A | Melt Furnace #5 8,000 lb/hr Aluminum Charge Internal Scrap & Clean AL Only (natural gas, 24.4 MMBtu/hr, installed 2003) | $PM_{10}$ | 0.2 | 0.9 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.2 | 0.6 |
| | | CO | 2.1 | 9.0 |
| | | $NO_X$ | 2.5 | 10.7 |
| 129 | Chiller Boiler #2 (natural gas, 6.0 MMBtu/hr, installed 2003) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.2 |
| | | CO | 0.6 | 2.3 |
| | | $NO_X$ | 0.6 | 2.7 |
| 130 | Powder Paint Cure Oven #1 (natural gas, 3.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.3 |
| | | $NO_X$ | 0.4 | 1.6 |
| 131 | Powder Paint Cure Oven #2 (natural gas, 3.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.2 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.3 |
| | | $NO_X$ | 0.4 | 1.6 |
| 132 | Cure Oven Exhaust – Clear Coat #3 (natural gas, 2.5 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.1 |
| 136 | Melt Furnace #4 10,000 lb/hr Al Charge Internal Scrap & Clean AL Only (natural gas, 16.0 MMBtu/hr, installed 2004) | $PM_{10}$ | 0.2 | 0.6 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 1.4 | 5.9 |
| | | $NO_X$ | 1.6 | 7.1 |
| 142 | Melt Furnace #3 (natural gas, 16.0 MMBtu/hr, installed 2012) | $PM_{10}$ | 0.2 | 0.6 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.4 |
| | | CO | 1.4 | 5.9 |
| | | $NO_X$ | 1.6 | 7.0 |

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel (Plantwide Condition #7) and by operating at or less than maximum capacity. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 03 | Melt Furnace #2 10,000 lb/hr Aluminum Charge Internal Scrap & Clean AL Only (natural gas, 16.0 MMBtu/hr, installed 2000) | PM | 0.2 | 0.6 |
| 21 | Solution Heat Treat #1 (natural gas, 3.0 MMBtu/hr, low $NO_X$ burners) | PM | 0.1 | 0.1 |
| 22 | Solution Heat Treat #2 (natural gas, 3.0 MMBtu/hr, low $NO_X$ burners) | PM | 0.1 | 0.1 |
| 23 | Solution Heat Treat #3 (natural gas, 3.0 MMBtu/hr, low $NO_X$ burners) | PM | 0.1 | 0.1 |
| 24A | Solution Heat Treat #4 (natural gas, 6.6 MMBtu/hr, low $NO_X$ burners, vent 1 of 2) | PM | 0.1 | 0.3 |
| 24B | Solution Heat Treat #4 (natural gas, 0.9 MMBtu/hr, low $NO_X$ burners, vent 2 of 2) | PM | 0.1 | 0.1 |
| 25 | Heat Treat Boilers #3 & #4 (natural gas, 2.7 MMBtu/hr, installed 2007) | PM | 0.1 | 0.1 |
| 26 | Heat Treat Boilers #1 & #2 (natural gas, 2.7 MMBtu/hr, installed 2007) | PM | 0.1 | 0.1 |
| 31 | Overhead Age Oven #1 (natural gas, 3.0 MMBtu/hr) | PM | 0.1 | 0.1 |
| 32 | Dry-off Oven – Paint #1 (natural gas, 1.5 MMBtu/hr) | PM | 0.1 | 0.1 |
| 33 | Dry-off Oven – Paint #2 (natural gas, 1.5 MMBtu/hr) | PM | 0.1 | 0.1 |
| 38 | Paint Cure Oven #3 (natural gas, 2.5 MMBtu/hr) | PM | 0.1 | 0.1 |
| 46 | Cure Oven Exhaust – Clear Coat #1(natural gas, 5.0 MMBtu/hr) | PM | 0.1 | 0.2 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 47 | Cure Oven Exhaust – Clear Coat #2 (natural gas, 6.0 MMBtu/hr) | PM | 0.1 | 0.2 |
| 48/49 | Clear Coat Boiler #1 (natural gas, 9.4 MMBtu/hr, installed 2000) | PM | 0.1 | 0.4 |
| 51A | Chiller Boiler #1 (natural gas, 6.0 MMBtu/hr, installed 2004) | PM | 0.1 | 0.2 |
| 62 | Caustic Tank Heater #1 (natural gas, 0.5 MMBtu/hr) | PM | 0.1 | 0.1 |
| 63 | Caustic Tank Heater #2 (natural gas, 1.0 MMBtu/hr) | PM | 0.1 | 0.1 |
| 70 | 2-Stage Washer Heater (natural gas, 1.0 MMBtu/hr) | PM | 0.1 | 0.1 |
| 106 | Bright Polish Boiler (natural gas, 6.3 MMBtu/hr, installed 1998) | PM | 0.1 | 0.3 |
| 107 | Bright Polish Dry-off Oven (natural gas, 5.0 MMBtu/hr) | PM | 0.1 | 0.2 |
| 108 | Bright Polish Clear Coat Oven (natural gas, 5.0 MMBtu/hr) | PM | 0.1 | 0.2 |
| 123A | Melt Furnace #1 8,000 lb/hr Aluminum Charge Internal Scrap & Clean AL Only (natural gas, 24.4 MMBtu/hr, installed 2002) | PM | 0.2 | 0.9 |
| 124 | Paint Room Boiler (natural gas, 7.5 MMBtu/hr, installed 2002) | PM | 0.1 | 0.3 |
| 125 | Clear Coat Back-up Boiler (natural gas, 9.4 MMBtu/hr, installed 2002) | PM | 0.1 | 0.4 |
| 126A | Solution Heat Treat #5 (natural gas, 9.0 MMBtu/hr, low $NO_X$ burners) | PM | 0.1 | 0.3 |
| 126B | Quench Tank Heater HT #5 (natural gas, 2.7 MMBtuhr) | PM | 0.1 | 0.1 |
| 127 | Overhead Age Oven #2 (natural gas, 9.0 MMBtu/hr) | PM | 0.1 | 0.3 |

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 128A | Melt Furnace #5<br>8,000 lb/hr Aluminum Charge<br>Internal Scrap & Clean AL Only<br>(natural gas, 24.4 MMBtu/hr, installed 2003) | PM | 0.2 | 0.9 |
| 129 | Chiller Boiler #2<br>(natural gas, 6.0 MMBtu/hr, installed 2003) | PM | 0.1 | 0.2 |
| 130 | Powder Paint Cure Oven #1<br>(natural gas, 3.5 MMBtu/hr) | PM | 0.1 | 0.2 |
| 131 | Powder Paint Cure Oven #2<br>(natural gas, 3.5 MMBtu/hr) | PM | 0.1 | 0.2 |
| 132 | Cure Oven Exhaust – Clear Coat #3 (natural gas, 2.5 MMBtu/hr) | PM | 0.1 | 0.1 |
| 136 | Melt Furnace #4<br>10,000 lb/hr Al Charge<br>Internal Scrap & Clean AL Only<br>(natural gas, 16.0 MMBtu/hr, installed 2004) | PM | 0.2 | 0.6 |
| 142 | Melt Furnace #3<br>(natural gas, 16.0 MMBtu/hr, installed 2012) | PM | 0.2 | 0.6 |

3. Visible emissions may not exceed 5% opacity for SN-03, 21-23, 24A/B, 25, 26, 31-33, 38, 46-49, 51A, 62, 63, 70, 106-108, 123A, 124, 125, 126A/B, 127, 128A, 129-132, 136, and 142 as measured by EPA Reference Method 9. Compliance with this condition is demonstrated by compliance with Plantwide Condition #7. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-04, 13, 15, 123B, 128B, 137, 143, and 144 – Fluxing Operations

Source Description

During the melting operations, the molten metal receives flux to control oxidation (SN-04, 123B, SN-128B, 137, and 143). PM/$PM_{10}$ emissions are based on total aluminum charge processed in Melt Furnace #1 (SN-123A), #2 (SN-03), #3 (SN-142), #4 (SN-136) and #5 (SN-128A). HCl and HF emissions are based on flux usage (SN-04/13, SN-137/15, SN-123B, SN-128B, and SN-143/144). Chips are reclaimed from machining operations and are also fluxed and added to the Melt Furnaces.

Specific Conditions

4. The permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour emission rates is demonstrated by permitting these sources at peak hourly rates. Compliance with ton per year emission rates is demonstrated by Specific Condition #6. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 04 & 13 | Melt Furnace #2 – Fluxing -Flux Hood (04) and Chip Well (13) | $PM_{10}$ | 1.2 | 5.3 |
| 137 & 15 | Melt Furnace #4 – Fluxing - Flux Hood (137) and Chip Well (15) | $PM_{10}$ | 1.2 | 5.3 |
| 123B | Melt Furnace #1 Flux Hood | $PM_{10}$ | 1.0 | 4.2 |
| 128B | Melt Furnace #5 Flux Hood | $PM_{10}$ | 1.0 | 4.2 |
| 143 & 144 | Melt Furnace #3 – Fluxing - Flux Hood (143) and Chip Well (144) | $PM_{10}$ | 1.0 | 4.2 |

5. The permittee shall not exceed the emission rates set forth in the table below. Compliance with pound per hour emission rates is demonstrated by permitting these sources at peak hourly rates. Compliance with ton per year emission rates is demonstrated by Specific Conditions #6, #7, #8 and #9. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 04 & 13 | Melt Furnace #2 – Fluxing - Flux Hood (04) and Chip Well (13) | PM<br>HCl[1]<br>HF[1] | 2.0<br>1.75<br>0.26 | 8.8<br>7.67<br>1.14 |
| 137 & 15 | Melt Furnace #4 – Fluxing - Flux Hood (137) and Chip Well (15) | PM<br>HCl[1]<br>HF[1] | 2.0<br>1.75<br>0.26 | 8.8<br>7.67<br>1.14 |

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 123B | Melt Furnace #1 Flux Hood | PM | 1.6 | 7.1 |
| | | HCl[1] | 0.19 | 0.84 |
| | | HF[1] | 0.04 | 0.15 |
| 128B | Melt Furnace #5 Flux Hood | PM | 1.6 | 7.1 |
| | | HCl[1] | 0.19 | 0.84 |
| | | HF[1] | 0.04 | 0.15 |
| 143 & 144 | Melt Furnace #3 – Fluxing - Flux Hood (143) and Chip Well (144) | PM | 1.6 | 7.1 |
| | | HCl[1] | 1.40 | 6.13 |
| | | HF[1] | 0.21 | 0.92 |

[1]HCl – Hydrochloric Acid; HF – Hydrogen Fluoride; HCl and HF are not VOCs; they are HAPs.

6. Total aluminum charge shall not exceed 87,600 tons combined of Aluminum per consecutive twelve months in Melt Furnaces #2 and #4 (SN-03 and 136, respectively). Total aluminum charge shall not exceed 70,080 tons combined of Aluminum per consecutive twelve months in Melt Furnaces #1 and #5 (SN-123A and 128A). Total aluminum charge shall not exceed 35,040 tons of Aluminum per consecutive twelve months in Melt Furnace #3 (142). $PM/PM_{10}$ emissions are based on tons of Aluminum melted and not flux usage. [Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

7. The permittee shall not process more flux than specified in the following table:

| SN | Maximum MP-355 Flux or Equivalent (tons/12 consecutive months) | Maximum MP-375 Flux or Equivalent (tons/12 consecutive months) |
|---|---|---|
| 04 & 13 | 13.14 | 26.28 |
| 137 & 15 | 13.14 | 26.28 |
| 123B | 6.57 | n/a |
| 128B | 6.57 | n/a |
| 143 & 144 | 13.14 | 26.28 |

[Regulation 18, §18.1004, Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311, and 40 CFR §70.6]

8. An equivalent to MP-355 flux shall not emit more than 254.33 lbs HCl and 43.64 lbs HF per ton flux at a maximum of 40% volatilization factor and conversion of F and Cl in the salts to HF and HCl. [Regulation 18, §18.1004, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311]

9. An equivalent to MP-375 flux shall not emit more than 450.58 lbs HCl and 65.45 lbs HF per ton flux at a maximum of 40% volatilization factor and conversion of F and Cl in the salts to HF and HCl. [Regulation 18, §18.1004, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311]

10. The permittee shall maintain records which demonstrate compliance with the limits set forth in Specific Conditions #6, #7, #8 and #9. The permittee shall maintain Material Safety Data Sheets or equivalent documentation on-site. The permittee shall maintain a twelve month rolling total and each individual month's data in a spreadsheet, database, or other well-organized format, kept on-site and make records available to Department personnel upon request. These records shall be updated no later than the fifteenth day of the month following the month to which the records pertain. [Regulation 18, §18.1004, Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

11. During Fluxing Operations visible emissions from SN-04/13, SN-137/15, SN-123B, SN-128B, and SN-143/144 shall not exceed 10% opacity as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition #8. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN-34, 35, 64, 65, 140, and 141 – Spray Paint Booths

Source Description

Six (6) Spray Paint Booths, SN-34, 35, 64, 65, 140 and 141, are used to paint wheels manufactured at the facility. All paints and coatings used on the wheels are HAP-FREE and are calculated at 100% VOC emissions. Some paint may contain non-VOC air contaminants.

Specific Conditions

12. The permittee shall not exceed the emission rates set forth in the table below. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #14 and #15. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 34 | Paint Booth - Line B #2 | VOC | 6.8 | 122.4 |
| 35 | Paint Booth – Line A #2 | VOC | 6.8 | |
| 64 | Paint Booth – Line A #1 | VOC | 6.8 | |
| 65 | Paint Booth – Line A #3 | VOC | 6.8 | |
| 140 | Paint Booth – Line B #1 | VOC | 6.8 | |
| 141 | Paint Booth – Clad Line | VOC | 6.8 | |

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by complying with Specific Conditions #16 and #17. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| Plantwide Non-VOC Air Contaminates | | Acetone | 4.8 | 19.0 |
| | | PCBTF | 23.2 | 92.6 |

14. The permittee shall not use any paint at SN-34, 35, 64, 65, 140 and 141 that contains VOCs in excess of 2.00 pounds per gallon and that contains any HAPs (HAP-free). [Regulation 19, §19.705, and/or Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311]

15. The permittee shall not exceed more than 122.4 tons per year of VOC combined at SN-34, 35, 64, 65, 140 and 141 per consecutive twelve month period. [Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

16. The permittee shall not exceed an acetone content of 1.58 pounds per gallon or a PCBTF content of 7.71 pounds per gallon in any paint used in the paint booths. [Regulation 19,

§19.705, and/or Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311]

17. The permittee shall not exceed more than 2000 gallons per month and 24,000 gallons per year of paint that contains acetone or PCBTF. [Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

18. The permittee shall maintain records which demonstrate compliance with the limits set forth in Specific Conditions #14, #15, #16, and #17. The permittee shall maintain Material Safety Data Sheets (MSDS) or equivalent documentation on-site. The permittee shall maintain a twelve month rolling total and each individual month's data in a spreadsheet, database, or other well-organized format, kept on-site and make records available to Department personnel upon request and shall be submitted in accordance with General Provision 7. These records shall be updated no later than the fifteenth day of the month following the month to which the records pertain. [Regulation 18, §18.1004, Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR Part 52, Subpart E]

## SN-16, 18A, and 18B – Chip Recovery System

### Source Description

In the Chip Recovery System, metal chips from both machining operations are collected in a central chip recovery system (SN-16 and 18A/B) and (Insignificant Activity, formerly SN-17, SN-19 and SN 20). The natural gas emissions from SN-16 exit through the stack above the boiler. The natural gas emissions from 18A heat the twin screw conveyor to further dry the chips. The chips travel along the heated twin screw conveyor to a separator that removes iron and larger chunks of aluminum. The screened chips are blown to hopper for temporary storage. The blower that moves the chips to the hopper uses the natural gas emissions combined with air to move the chips. The emissions from the SN-18B labeled stack are natural gas emissions from SN-18A, water vapor and any remaining coolant that was not rinsed off prior to chip drying.

### Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel (Plantwide Condition #7), by operating at or less than maximum capacity and by complying with Specific Condition #22. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 16 | Chip Recovery Boiler (natural gas, 2.5 MMBtu/hr, installed 1999) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.0 |
| | | $NO_X$ | 0.3 | 1.1 |
| 18A | Chip Recovery Cyclone (natural gas, 2.8 MMBtu/hr) | $PM_{10}$ | 0.1 | 0.1 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.3 | 1.1 |
| | | $NO_X$ | 0.3 | 1.3 |
| 18B | Chip Recovery Coolant Emissions | VOC | 4.9 | 21.4 |

20. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by using natural gas as the only fuel (Plantwide Condition #7) by operating at or less than maximum capacity and by complying with Specific Condition #22. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lb/hr | tpy |
|---|---|---|---|---|
| 16 | Chip Recovery Boiler (natural gas, 2.5 MMBtu/hr, installed 1999) | PM | 0.1 | 0.1 |
| 18A | Chip Recovery Cyclone (natural gas, 2.8 MMBtu/hr) | PM | 0.1 | 0.1 |

21. Visible emissions may not exceed 5% opacity for SN-16 and18A and may not exceed 10% opacity for SN-18B as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition #7 for SN-16 and 18A and Plantwide Condition #8 for SN-18B. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

22. The permittee shall not use any coolant at SN-18B that contains VOCs in excess of 1.5 percent by volume as applied. The coolant shall not contain any HAPs (HAP-free). [Regulation 19, §19.705, and/or Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311]

23. The permittee shall maintain records which demonstrate compliance with the limits set forth in Specific Condition #22. The permittee shall maintain the formulation, usage records, Material Safety Data Sheets (MSDS) or equivalent documentation on-site. The permittee shall maintain monthly and twelve month rolling total for SN-18B data in a spreadsheet, database, or other well-organized format, kept on-site and make records available to Department personnel upon request and shall be submitted in accordance with General Provision 7. These records shall be updated no later than the fifteenth day of the month following the month to which the records pertain. [Regulation 18, §18.1004, Regulation 19, §19.705, A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311 and 40 CFR Part 52, Subpart E]

SN-82, 109, 116, 121, and 122 – Polishing Operation

Source Description

There are seven (7) rotary polishers in the Polishing Operation. Emissions from the rotary polishers are controlled by five (5) mechanical dust collectors, SN-82, 109, 116, 121 and 122.

Specific Conditions

24. The permittee shall not exceed the emission rates set forth in the table below. Compliance with ton per year emission rates is demonstrated by permitting these sources at maximum operating capacity. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 82 | One Rotary Polisher (with dust collector @99.4% eff.) | $PM_{10}$ | 0.3 | 1.4 |
| 109 | Two Rotary Polishers (with dust collector @99.4% eff.) | $PM_{10}$ | 0.5 | 1.8 |
| 116 | One Rotary Polisher (with dust collector @99.4% eff.) | $PM_{10}$ | 0.2 | 0.9 |
| 121 | Two Rotary Polishers (with dust collector @99.4% eff.) | $PM_{10}$ | 0.4 | 1.8 |
| 122 | One Rotary Polisher (with dust collector @99.4% eff.) | $PM_{10}$ | 0.2 | 0.9 |

25. The permittee shall not exceed the emission rates set forth in the following table. Compliance with pound per hour and ton per year emission rates are demonstrated by permitting these sources at maximum capacity. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 82 | One Rotary Polisher (with dust collector @99.4% eff.) | PM | 2.0 | 8.7 |
| 109 | Two Rotary Polishers (with dust collector @99.4% eff.) | PM | 2.7 | 11.9 |
| 116 | One Rotary Polisher (with dust collector @99.4% eff.) | PM | 1.4 | 5.8 |
| 121 | Two Rotary Polishers (with dust collector @99.4% eff.) | PM | 2.7 | 11.5 |
| 122 | One Rotary Polisher (with dust collector @99.4% eff.) | PM | 1.4 | 5.8 |

26. The permittee shall not exceed 10% opacity at SN-82, 109, 116, 121 and 122 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition #8. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A.§8-4-304 and §8-4-311]

## SN-138 – Fluidized Bed Burn-off Oven

### Source Description

SN-138 is a 1.5 MMBtu/hr fluidized bed burn-off oven that heats and aerates a bed of sand to provide maximum cleaning capacities and residue collection efficiencies of the cyclone of the paint hooks. SN-138 also includes two high efficiency cyclones to collect the residual ash.

### Specific Conditions

27. The permittee shall not exceed the emission rates set forth in the table below. The pound per hour and ton per year pollutant emission rates are based on the maximum capacity of the equipment and by using natural gas as the only fuel. [Regulation 19, §19.501 et seq., and 40 CFR Part 52, Subpart E]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 138 | Fluidized Bed Burn-off Oven (natural gas, 1.5 MMBtu/hr and residual paint with 98.9% cyclone eff) | $PM_{10}$ | 1.3 | 5.5 |
| | | $SO_2$ | 0.1 | 0.1 |
| | | VOC | 0.1 | 0.1 |
| | | CO | 0.2 | 0.6 |
| | | $NO_X$ | 0.2 | 0.7 |

28. The permittee shall not exceed the emission rates set forth in the following table for SN-138. The pound per hour and ton per year pollutant emission rates are based on the maximum capacity of the equipment and by using natural gas as the only fuel. [Regulation 18, §18.801, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

| SN | Description | Pollutant | lbs/hr | tons/yr |
|---|---|---|---|---|
| 138 | Fluidized Bed Burn-off Oven (natural gas, 1.5 MMBtu/hr and residual paint with 98.9% cyclone eff) | PM | 1.3 | 5.5 |

29. The permittee shall not exceed 10% opacity at SN-138 as measured by EPA Reference Method 9. Compliance with this condition shall be demonstrated by compliance with Plantwide Condition #7. [Regulation 18, §18.501, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

## SECTION V: COMPLIANCE PLAN AND SCHEDULE

Superior Industries International Arkansas, LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

## SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19 §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) calendar days after completing the testing. [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

4. The permittee must provide:

   a. Sampling ports adequate for applicable test methods;
   b. Safe sampling platforms;
   c. Safe access to sampling platforms; and
   d. Utilities for sampling and testing equipment.

   [Regulation 19 §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19 §19.303 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee shall burn only pipeline quality natural gas as fuel at the facility. Combustion emissions from fuel burning process equipment have been calculated at full load for continuous operation and no calculated recordkeeping of natural gas usage is

required. [Regulation 18, §18.1004, Regulation 19, §19.705, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8 4-311, and 40 CFR 70.6]

8. The permittee shall conduct weekly opacity observations of required sources by trained personnel familiar with the facility's opacity requirements and keep a record of these observations. The permittee shall maintain personnel trained in EPA Reference Method 9. If the permittee detects visible emissions in exceedance of the permitted limit, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee must maintain records which contain the following items in order to demonstrate compliance with this specific condition. The permittee must keep these records updated weekly, maintained onsite and make them available to Department personnel upon request. [Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    a. The date and time of all observations.
    b. Show the results of the observation of the source.
    c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
    d. The name of the person conducting the opacity observations..

9. All aluminum billets and logs processed shall be free of any paints, coatings, or lubricants. [Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. Purchase invoices and receipts of aluminum billets, MSDS sheets or equivalent documentation will be proof of clean charge. The permittee shall maintain these records, in a well-organized format to demonstrate compliance with Plantwide Condition #9. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain, maintain on-site, and make available to Department personnel upon request. [Regulation 18, §18.1004, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

11. The permittee shall submit an application for a permit modification to the Department by November 3, 2012 to incorporate the provisions of 40 CFR Part 63 Subpart ZZZZ for the two emergency back-up 50 kW diesel generators and one emergency back-up 100 kW diesel generator.

**Title VI Provisions**

12. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

13. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

14. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

15. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

16. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

## SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated May 12, June 2, 3, September 4, 17, December 21, 2009; January 7, 25, and April 15, 2010; August 17 2012.

| Description | Category |
|---|---|
| Eight (8) Mold Side Core heaters, natural gas, 0.192 MMBtu/hr | A-1 |
| 40" Ring Burner, natural gas, 0.25 MMBtu/hr | A-1 |
| Five (5) Ladle Heaters, natural gas, 3.75 MMBtu/hr | A-1 |
| Riser Tube Oven, natural gas, 1.5 MMBtu/hr | A-1 |
| Casting Mold Pre-Heat Oven, natural gas, 2.0 MMBtu/hr | A-1 |
| Three (3) Mold Shop Mold Ovens, natural gas, 1.2 MMBtu/hr | A-1 |
| Four (4) Wheel-a-brator Shot Blast (formerly SN-41 through SN-44) | A-13 |
| Two (2) Sand Blast Units (formerly SN-134 & 134B) | A-13 |
| One (1) Tumble Blast Unit (formerly SN-135) | A-13 |
| Three (3) Chip Recovery System Vents (formerly SN-17, 19 & 20) | A-13 |
| Four (4) Aqueous Parts Washing Vents (formerly SN-66 & 67) | A-13 |
| Two (2) Drying Operation Vents (formerly SN-68 & 78) | A-13 |
| Four (4) Powder Coat Paint Booths | A-13 |
| Pangborn Shot Blaster | A-13 |
| Dry Ice Generator | A-13 |
| Nitrogen Generation Operation | A-13 |
| Two (2) Cooling Towers | A-13 |
| Clear Coat Paint Pump Room Vent | A-13 |
| Maxi Blast Unit (fully enclosed) | A-13 |
| Two Emergency (only) Back-up 50 kW Diesel Generators (nte 500 hours) | A-13 |
| One Emergency (only) Back-up 100 kW Diesel Generator (nte 500 hours) | A-13 |

| Description | Category |
|---|---|
| "Wel-Cote" Mold Paint (formerly SN-100) | A-13 |
| QA/QC "shot" – Green (formerly SN-101) | A-13 |
| Line #1 Clear Coat Oven Tunnel Exhaust | A-13 |

## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and Regulation 26 §26.701(B)]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit.

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses performed;
    c. The company or entity performing the analyses;
    d. The analytical techniques or methods used;
    e. The results of such analyses; and
    f. The operating conditions existing at the time of sampling or measurement.

    [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26 §26.701(C)(2)]

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below:

    Arkansas Department of Environmental Quality
    Air Division
    ATTN: Compliance Inspector Supervisor
    5301 Northshore Drive
    North Little Rock, AR 72118-5317

    [40 CFR 70.6(a)(3)(iii)(A) and Regulation 26 §26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

    a. For all upset conditions (as defined in Regulation19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:

        i. The facility name and location;
        ii. The process unit or emission source deviating from the permit limit;
        iii. The permit limit, including the identification of pollutants, from which deviation occurs;
        iv. The date and time the deviation started;
        v. The duration of the deviation;
        vi. The average emissions during the deviation;
        vii. The probable cause of such deviations;
        viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
        ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19 §19.601 and §19.602, Regulation 26 §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26 §26.701(E), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26 §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26 §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26 §26.703(B)]

    a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26 §26.703(E)(3)]

a. The identification of each term or condition of the permit that is the basis of the certification;
b. The compliance status;
c. Whether compliance was continuous or intermittent;
d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26 §26.704(C)]

a. The provisions of Section 303 of the Act (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 applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:

a. Such an extension does not violate a federal requirement;
b. The permittee demonstrates the need for the extension; and

c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Regulation 18 §18.314(A), Regulation 19 §19.416(A), Regulation 26 §26.1013(A), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:

a. Such a request does not violate a federal requirement;
b. Such a request is temporary in nature;
c. Such a request will not result in a condition of air pollution;
d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Regulation 18 §18.314(B), Regulation 19 §19.416(B), Regulation 26 §26.1013(B), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:

a. The request does not violate a federal requirement;
b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Regulation 18 §18.314(C), Regulation 19 §19.416(C), Regulation 26 §26.1013(C), A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E]

# APPENDIX A

*Table of Sources Removed from Service*

Superior Industries International, Inc.

AFIN: 72-00270 and Permit #1302-AOP-R16

Fayetteville, AR

Appendix A

| Sources Removed from Service | | |
|---|---|---|
| Source Number | Description | Year Removed |
| 01 | #1 6,000 lb Melt Furnace | 2002 |
| 02 | #1 6,000 lb Melt Furnace Flux Hood Exhaust | 2002 |
| 05 | #3 8,000 Lb Melt Furnace | 2008 |
| 06 | #3 8,000 lb Melt Furnace Flux Hood Exhaust | 2007 |
| 07 | #4 8,000 lb Melt Furnace | 2004 |
| 08 | #4 8,000 lb Melt Furnace Flux Hood Exhaust | 2004 |
| 09 | #5 4,000 lb Melt Furnace | 2002 |
| 10 | #5 4,000 lb Melt Furnace Flux Hood Exhaust | 2002 |
| 11 | #6 4,000 lb Melt Furnace | 2002 |
| 12 | #6 4,000 lb Melt Furnace Flux Hood Exhaust | 2002 |
| 14 | Chip Well Exhaust Stack | 2008 |
| 27 | Power Washer Stage #1 Heater Tube Exhaust | 2002 |
| 28 | Power Washer Stage #2 & #3 Heater Tube Exhaust | 2002 |
| 29 & 30 | Pre-treat Process | 2002 |
| 36 & 37 | Cure Oven – "Paint #1 and #2" | 2003 |
| 39 & 40 | Cooling Tunnel Exhaust | --- |
| 45 | Hanger Burn Off Oven | 2006 |
| 50 | Cooling Ring Acid Bath Exhaust | 2009 |
| 52 | Chrome Bearing Exhaust | 2008 |
| 53 | Nitric Acid Bearing Exhaust | 2008 |
| 54 & 55 | General Acid/Alkali Exhaust (System #4 and #3) | 2008 |
| 56 | Painting Plant Boiler | 2008 |

Superior Industries International, Inc.

AFIN: 72-00270 and Permit #1302-AOP-R16

Fayetteville, AR

Appendix A

| Sources Removed from Service | | |
|---|---|---|
| Source Number | Description | Year Removed |
| 57, 58 | Natural gas-fired Equipment (Miscellaneous) | 2008 |
| 59 | Chip Well Exhaust Stack | --- |
| 60 | Hanger Burn Off Oven | 2006 |
| 61 | Sprue Furnace | --- |
| 69 | Steam Vent for Power Washer Stage #1 | 2002 |
| 71 | --- | --- |
| 72 | Spray Painting Booth | 2008 |
| 73 | Spray Painting Booth – Touch-up/Rework | 2008 |
| 74 | Powder Coat Spray Booth | 2008 |
| 75, 76, 77 & 81 | Natural gas-fired equipment (Miscellaneous) | 2008 |
| 79, 80, 95, 96 & 99 | Aqueous Parts Washing Vents | 2009 |
| 85, 86, 90 | Mist Collector Exhausts | --- |
| 83, 84, 87, 92 & 94 | Mist Collector Exhausts | 2008 |
| 88, 89, 91 & 93 | Mist Collector Exhausts | 2009 |
| 97 | Steam Vent for Bright Polish Wash Line | --- |
| 105 | Bright Polish Paint Booth | 2004 |
| 111 | Ink Transfer Operation | 2009 |
| 112 | Nickel Plating Baths | 2008 |
| 113 | Copper Plating Baths | 2008 |
| 114 | Clear Coat Touch-Up Booth | 2009 |
| 115 | --- | 2006 |

Superior Industries International, Inc.

AFIN: 72-00270 and Permit #1302-AOP-R16

Fayetteville, AR

Appendix A

| Sources Removed from Service | | |
|---|---|---|
| Source Number | Description | Year Removed |
| 117 | Crucible Furnace | --- |
| 118 | Crucible Furnace | --- |
| 119 | Clear Coat Touch-Up Booth | 2009 |
| 120 | Sludge Dryer | 2008 |
| 133 | Powder Coat Paint Booth | 2009 |
| 139 partial | Mold Pre-heat Oven, never installed | --- |
| 98, 102, 103, 104 & 110 | Numbers Reserved | --- |

R14 – Updated 11/04/2010 – pc
R15 – No change 2/28/2011 – ats
R16 – No change 10/21/2011 - ats
R17 – No change 3/15/2012
R18 – No change 8/17/2012