

Secondary Aluminum Production MACT Training Workshop

Sessions and Content

I. Introductions

- Who we are
 - EPA representative
 - RTI representative
- Objectives of training
- Format of today's training session

II. Overview of Industry and NESHAP

- Secondary aluminum industry
 - What they do
 - Who they are
 - Secal companies
 - Sweat furnace operators
 - Die casters and foundries
 - How many secondary aluminum sources are there
 - What HAPs are emitted
- Secondary aluminum NESHAP
 - Background on NESHAP & MACT rules
 - History(brief) of secondary aluminum NESHAP - proposal, final, petitions, settlement agreements, amendments, direct final rules
 - Who's affected
 - What HAPs are regulated
 - What are the environmental benefits
 - What does the rule require: emission standards, operating requirements, etc.

III. Applicability and Description/ Function of Affected Units (*Utilizing pictures/diagrams*)

- Types of Secondary aluminum operations:
 - Preprocessing of scrap aluminum (size reduction, removal of oils, coatings, other contaminants)
 - Furnace operations (melting, in-furnace refining, fluxing, tapping)
 - Additional refining (in-line fluxing)
 - Cooling of dross
- Affected Sources:
 - Crushing, shedding and grinding
 - Use: Size reduction
 - Emissions: PM containing metal HAPs dust
 - Chip dryers
 - Use: Evaporate oil and/or moisture from uncoated aluminum chips and borings
 - Operating temperatures

Emissions: Organic pollutants, including D/F
Scrap dryer/delacquering kiln/decoating kiln
Use: Remove coatings and other contaminants (paints, oils, lacquers, rubber, plastic laminates)
Operating temperatures
Emissions: Organic HAPs, D/F, inorganic HAPs
Sweat furnaces
Use: Reclaim aluminum from scrap iron
Batch mode
Products
Emissions: D/F
Process furnaces
Use: For melting scrap
Types (melting, holding, refining)
Charging scrap
Fluxing
Emissions: HAPs from scrap and/or flux (metals, HCl, D/F)
Dross-only furnaces
Use: Reclaim aluminum from drosses
Emissions: PM including metal HAPs
Rotary dross cooler
Use: Cool dross
Emissions: PM including metal HAP
In-line fluxers
Use: Refining, including degassing
Fluxing agents
Emissions: HCl and PM

IV. Emissions Standards and Operating Requirements for Affected Units

- Aluminum scrap shredder
- Thermal chip dryer
- Scrap dryer/delacquering kiln/decoating kiln
- Group 1 and 2 furnaces
- Sweat furnace
- Dross only furnace
- Rotary dross cooler
- Secondary aluminum processing unit (*practical exercise using equations to calculate emission limits for PM, HCL and D/F*)

V. Monitoring Requirements

- OMM plans, labeling, capture/collection, feed/charge weight, etc.
- Operation and Maintenance Plan
- Requirements for Emission unit/Pollution control equipment combinations

(Practical exercise calculating 3 day/24 hour rolling average for Secondary aluminum processing unit)

VI. Performance Testing/Compliance Demonstration Requirements for Affected Units

(Practical exercise using equations for determining compliance: Section 63.1513)

- Aluminum scrap shredder
- Thermal chip dryer
- Scrap dryer/delacquering kiln/decoating kiln
- Group1 and 2 furnaces
- Sweat furnace
- Dross only furnace
- Rotary dross cooler
- Secondary aluminum processing unit

VII. Reporting/Recordkeeping Requirements

(Focus on Reports/Records which should be reviewed prior to and during inspection.)

- Notifications
- Reports
- Records

VIII. Review status of litigation and possible changes to MACT Standard

- History of petitions, settlement agreements
- Proposed amendments
- Direct final rule

IX. Review of Available Implementation Tools/Wrap-up

- Workshops
- Implementation Web site (<http://www.epa.gov/atw/alum2nd/alum2pg.html#TECH>)
- Inspection checklist (Region 7)