

02/10/2026

VIA EMAIL

Catherine Valladolid
Valladolid.Catherine@epa.gov

Subject: Air Quality Control Permit No. 106233
Aluminum Dynamics Inc.

Dear Ms. Valladolid:

Thank you for meeting with the Arizona Department of Environmental Quality (ADEQ) on February 2, 2026 regarding your review of Aluminum Dynamic Inc.'s (ADI's or the Permittee) proposed final air quality permit. Below are the comments made by the EPA on the proposed final air quality permit and ADEQ's responses to each.

- 1. Various permit conditions have multiple monitoring options with no indication of selected monitoring method. Though all monitoring options are permitted, clarity on the applicable standards or limits without knowing the selected monitoring method becomes more challenging.**

ADEQ reviewed the permit to find each instance in which multiple monitoring methods are available to the Permittee, but no notification or request is required to be submitted. For each of these instances, ADEQ added additional notification requirements to ensure the monitoring option selected is known at all times. Below are the areas of the permit where these notifications were added.

Condition II.1.3.g of Attachment "B" – Aluminum Scrap Shredder

The aluminum scrap shredder has the monitoring options of operating a bag leak detection system, operating a continuous opacity monitor, or conducting visible emissions observations on the baghouse controlling emissions from the aluminum scrap shredder. The following notification requirements were added to the permit for these options:

Condition II.1.3.g(d) of Attachment "B" - At least 30 days prior to startup, the Permittee shall submit a notification to the Director indicating the monitoring method option listed in Condition II.1.3.g(1) above that is being selected. The Permittee shall not change monitoring methods without notifying the Director as required in Condition II.1.3.g(1)(e) below.

Condition II.1.3.g(e) of Attachment “B” - *The Permittee shall submit a notification at least 30 days prior to switching the monitoring method to a different method listed in Condition II.1.3.g(1) above.*

Condition II.1.3.h of Attachment “B” – Decoater Furnace

The Decoater Furnace has the monitoring options of operating a bag leak detection system or operating a continuous opacity monitor system. The following notification requirements were added to the permit for these options:

Condition II.1.3.h(6) of Attachment “B” - *At least 30 days prior to startup, the Permittee shall submit a notification to the Director indicating the monitoring method option in Condition II.1.3.h(2) or II.1.3.h(3) above that is being selected. The Permittee shall not change monitoring methods without notifying the Director as required in Condition II.1.3.h(7).*

Condition II.1.3.h(7) of Attachment “B” - *The Permittee shall submit a notification at least 30 days prior to switching the monitoring method to a different method in Condition II.1.3.h(2) or II.1.3.h(3) above.*

Condition II.1.3.j of Attachment “B” – Group 1 Furnaces (Sidewell Melting Furnaces and Holding Furnace)

The Sidewell Melting Furnaces and Holding Furnace has the monitoring options of operating a bag leak detection system or operating a continuous opacity monitor system. The following notification requirements were added to the permit for these options:

Condition II.1.3.j(8) of Attachment “B” - *At least 30 days prior to startup, the Permittee shall submit a notification to the Director indicating the monitoring method option in Condition II.1.3.j(1) or II.1.3.j(2) above selected. The Permittee shall not change monitoring methods without notifying the Director as required in Condition II.1.3.j(8).*

Condition II.1.3.j(9) of Attachment “B” - *The Permittee shall submit a notification at least 30 days prior to switching the previously selected monitoring method to a different option in Condition II.1.3.j(1) or II.1.3.j(2) above.*

- 2. Condition II.1.5.a of Attachment “B” is ambiguous and a request to ensure that the requirements of 40 CFR 63.1510(a) and Table 3 of 40 CFR 63 Subpart RRR are included in detail in the permit.**

ADEQ reviewed the requirements of 40 CFR 63.1510(a) and Table 3 of 40 CFR 63 Subpart RRR to ensure that the requirements listed in these citations are included in the permit as applicable. Though this permit condition alone may be difficult to demonstrate compliance with, each of the applicable requirements referenced within are explicitly outlined in the permit. Below are examples of requirements of 40 CFR 63.1510(a) and Table 3 of 40 CFR 63 Subpart RRR and the associated permit condition within the permit.

40 CFR 63.1510(a) or Table 3 of in 40 CFR 63 Subpart RRR	Requirement	Associated Permit Condition
40 CFR 63.1510(a)(1) Table 3 of 40 CFR 63 Subpart RRR	OM&M Plan	II.I.2 of Attachment "B"
40 CFR 63.1510(a)(2) Table 3 of 40 CFR 63 Subpart RRR	Labeling	II.I.3.d of Attachment "B"
40 CFR 63.1510(a)(3) Table 3 of 40 CFR 63 Subpart RRR	Capture and Control System	II.I.3.e of Attachment "B"
40 CFR 63.1510(a)(4) Table 3 of 40 CFR 63 Subpart RRR	Feed/Charge Weight Monitoring	II.I.3.f of Attachment "B"
40 CFR 63.1510(a)(5) Table 3 of 40 CFR 63 Subpart RRR	Bag Leak Detection System Requirements	II.I.5.c(1) of Attachment "B"
40 CFR 63.1510(a)(6) Table 3 of 40 CFR 63 Subpart RRR	Afterburners	II.I.5.d of Attachment "B"
40 CFR 63.1510(a)(7) Table 3 of 40 CFR 63 Subpart RRR	Fabric Filter Inlet Temperature	II.I.5.e of Attachment "B"
40 CFR 63.1510(a)(8) Table 3 of 40 CFR 63 Subpart RRR	Monitoring Lime Injection	II.I.5.f of Attachment "B"
40 CFR 63.1510(a)(9) Table 3 of 40 CFR 63 Subpart RRR	Monitoring Total Reactive Flux Injection	II.I.5.g of Attachment "B"
40 CFR 63.1510(a)(11)	Group 1 Sidewell Furnaces Processing	II.I.5.j of Attachment "B"
40 CFR 63.1510(a)(15)	Site-Specific Requirements for Secondary Aluminum Processing Units	II.I.2.d of Attachment "B"
40 CFR 63.1510(a)(16)	Secondary Aluminum Processing Units	II.I.5.h of Attachment "B"
40 CFR 63.1510(a)(17)	Secondary Aluminum Processing Unit Compliance by Individual Emission Unit Demonstration	II.I.5.h(2) of Attachment "B"
40 CFR 63.1510(a)(18)	Alternative Lime Addition Monitoring Methods Applicable to	II.I.5.df(5) of Attachment "B"

40 CFR 63.1510(a) or Table 3 of in 40 CFR 63 Subpart RRR	Requirement	Associated Permit Condition
	Lime-Injected Fabric Filters	
40 CFR 63.1510(a)(19)	Approval of Alternate Methods for Monitoring Group 1 Furnaces	II.I.5.k of Attachment “B”
Table 3 of 40 CFR 63 Subpart RRR	COMS	Multiple conditions as applicable to equipment
Table 3 of 40 CFR 63 Subpart RRR	VE	Multiple conditions as applicable to equipment
Table 3 of 40 CFR 63 Subpart RRR	Group 1 Furnaces That Will Be Idled For at Least 24 Hours	II.I.3.j(7) of Attachment “B”
Table 3 of 40 CFR 63 Subpart RRR	Maintain Molten Aluminum Level	II.I.3.j(6) of Attachment “B”
Table 3 of 40 CFR 63 Subpart RRR	Fluxing in Sidewell Furnace Hearth	II.I.3.j(6) of Attachment “B”

3. Conditions II.I.6.j.2 and 3 of Attachment “B” is unclear if the Permittee is subject to the alternative limits referenced from 40 CFR 63 Subpart RRR.

Conditions II.I.6.j.2 and 3 of Attachment “B” begin “If the Decoater Furnace is subject to the alternative limits in Condition II.I.4.b above...” The ‘if’ statement could potentially lead to confusion if other limits may apply to the Decoater.

These permit conditions are derived from the requirements of 40 CFR 63 Subpart RRR for the performance testing requirements of the Decoater. The alternative limits referenced in this condition are for Decoaters that install and operate an afterburner. The Permittee is required to equip an afterburner on the Decoater as stated in Condition II.I.4.b of Attachment “B”. Therefore, Conditions II.I.6.j.2 and 3 apply to the Decoater as well as the alternative limits of 40 CFR 63 Subpart RRR referenced. Only the alternative limits of 40 CFR 63 Subpart RRR referenced in the conditions are included in the permit as no other limits would apply.

Both of these conditions were updated to exclude the leading ‘if’ statements. This will ensure clarity that the Permittee is subject to the requirements of both of these conditions. The conditions were updated to the following:

Conditions II.I.6.j.2: The Permittee shall maintain the average afterburner operating temperature in each 3-hour block period at or above 760 °C (1400 °F) for the test.

Conditions II.1.6.j.3: *The Permittee shall submit a written certification in the notification of compliance status report containing the information required by Condition II.1.8.b(7) below.*

If you have any questions, please contact me at (602) 771-4375 or Lichtenberg.Bill@azdeq.gov, or Karla Murrieta at (602) 771-2283 or Murrieta.Karla@azdeq.gov.

Sincerely,

DocuSigned by:
Bill Lichtenberg
B17E5E49BC6B47D...
Bill Lichtenberg
Permit Engineer
Air Permits Unit