

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Novelis ALR Aluminum, LLC (Novelis Davenport Finishing), located at 1725 Rockingham Rd, Davenport, IA 52802 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Alan Toulou.
2. Novelis ALR Aluminum, LLC (Novelis Davenport Finishing) is a secondary aluminum processing facility. This facility consists of 15 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	14.20
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	15.46
Particulate Matter	PM	15.72
Sulfur Dioxide	SO ₂	0.36
Nitrogen Oxides	NO _x	60.92
Volatile Organic Compounds	VOC	197.97
Carbon Monoxide	CO	52.46
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	168.03

⁽¹⁾ May include the following: Hexane, Formaldehyde, Xylene, Dimethyl Phthalate, Methanol, Isophorone, Naphthalene, Cumene, Ethylbenzene, Styrene, MIBK, Toluene, Glycol Ethers and Ethylene Glycol.

3. Novelis ALR Aluminum, LLC (Novelis Davenport Finishing) submitted a Title V Operating Permit renewal application on February 8, 2024. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from July 18, 2024 through August 17, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Zane Peters
Iowa Department of Natural Resources - Air Quality Bureau
6200 Park Ave
Ste. #200
Des Moines, Iowa 50321
Phone: (515) 808-0458
E-mail: zane.peters@dnr.iowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 21-35.
4. DNR is required to comply with 567 IAC Chapter 24 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Renewal 4 Review Notes

Facility Name: Novelis ALR Aluminum, LLC
(Novelis Davenport Finishing)
Facility Number: 82-01-017
EIQ: 92-3824
Permit Number: 00-TV-060R4
Reviewer: Zane Peters
Date: 5/20/24

Novelis ALR Aluminum, LLC (Novelis Davenport Finishing) is a secondary aluminum processing facility located in Davenport, IA. The facility performs a variety of steps to finish and coat aluminum coils received from another Novelis facility (Novelis Aluminum Casting (facility ID: 82-01-089)).

The Title V renewal application was received on 02/08/2024. This is the fourth renewal.

Facility is subject to Title V as it is a Major stationary source for VOC (PTE 100 tpy or more), single and total HAPs (10 tpy or more of any HAP; 25 tpy or more of any combination HAPs). Facility is an aluminum coil finishing facility and has 15 emission points with the Potential to Emit (annually):

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter (\square 2.5 \square m)	PM2.5	14.20
Particulate Matter (\square 10 \square m)	PM10	15.46
Particulate Matter	PM	15.72
Sulfur Dioxide	SO2	0.36
Nitrogen Oxides	NOx	60.92
Volatile Organic Compounds	VOC	197.97
Carbon Monoxide	CO	52.46
Lead	Lead	0.00
Hazardous Air Pollutants (1)	HAP	168.03

(1) May include the following- Hexane, Formaldehyde, Xylene, Dimethyl Phthalate, Methanol, Isophorone, Naphthalene, Cumene, Ethylbenzene, Styrene, MIBK, Toluene, Glycol Ethers and Ethylene Glycol.

Applicability Requirements

40 CFR 61 Subpart M – National Emission Standard for Asbestos

- Subject only to the NESHAP for Demolition and Renovation of Asbestos Containing Structures identified in 40 CFR §61.145.

40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers

- Affected units are Annealing Furnaces (EU 09a-09e) and Waste Heat Boiler (EU 17). 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- Affected unit is the Emergency Generator (EU GEN2).
 - The emergency engine is subject to 40 CFR Part 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). According to 40 CFR 63.6590(a)(2)(ii) this spark ignition emergency engine, located at a major source, is a new stationary RICE as it was constructed on or after June 12, 2006.
 - According to 40 CFR 63.6590(c)(6), this emergency engine must meet the requirements of subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ for spark ignition engines. No further requirements apply for this engine under subpart ZZZZ.

40 CFR 63 Subpart SSSS – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

- Affected Units are the Prime and Finish Roll Lines (EU 01a, 01b, and 02).
- The initial notification for SSSS was received on 10/25/04 and compliance testing was conducted on 4/27/05. DNR accepted the destruction efficiency results on 7/11/05 and a notification of compliance status was received on 7/31/06 showing 98.4% VOC destruction to meet SSSS requirements and including the required startup, shutdown and malfunction plan.

Note

EP 02- Construction Permit 76-A-313-S1 is the active permit issued November 5, 2004. DNR received a rescission request for 76-A-313 from the Facility on January 18, 2005. CP 75-A-313-S1 supersedes 76-A-313 as it was active prior to rescission.

Emission Point Specific Changes

General Changes

- Permit numbers and relevant dates changed
- Supervisor of Air Operating Permits Section updated
- Responsible Official and Permit Contact updated
- General Conditions updated

Emission Point Specific Changes

- EU SRU – REMOVED from the Insignificant Activities list as indicated in the application packet (pp. 4)