

STATEMENT OF BASIS for Novelis ALR Rolled Products, Inc.

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 55796 / Permit Activity Number: BOP200002

I. FACILITY INFORMATION

Novelis ALR Rolled Products, Inc. is located at 838 N Delsea Drive Clayton, Gloucester County 08312, and consists of an aluminum processing facility. The facility is owned by Novelis ALR Rolled Products, Inc. and is operated by Novelis ALR Rolled Products, Inc.

The facility is classified as a Title V facility with emissions currently below Title V thresholds based on its potential to emit.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 1 pound per year of total HAPs from insignificant sources. Total HAPs emissions from insignificant sources and/or non-source fugitives are estimated values and are not speciated.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: a pump house boiler, space heaters, and makeup air heaters, all firing natural gas. The facility previously housed process equipment that was removed and/or taken offline due to closure of the facility, via Minor Modification permit BOP240001.

Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, significant modifications, or General Operating Permits (GOP) since the approval of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

This is a Permit Renewal does not include any changes since Minor Modification BOP240001.

There are no proposed changes to air contaminants.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.
3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:

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- Equipment size and capacity limitations,
- Subject equipment being permitted at the maximum rated capacity,
- There is no specific state or Federal standard that applies to this piece of equipment,
- Not a pollutant of concern for this piece of equipment,
- Agreements with EPA on the frequency of testing and monitoring for combustion sources.

Based on the above criteria, there is no direct or surrogate monitoring for the following pieces of equipment:

- E402 (U1) Boiler 4 NG
- E2701 (U2) MR Heater 1
- E2702 (U2) MR Heater 2
- E6401 (U2) Heater 1
- E6402 (U2) Heater 2
- E6403 (U2) Heater 3
- E6404 (U2) Heater 4
- E6405 (U2) Heater 5
- E6406 (U2) Heater 6
- E6407 (U2) Heater 7
- E6501 (U4) Makeup 1
- E6503 (U4) Makeup 2
- E6502 (U4) Makeup 3

V. APPLICABLE STATE AND FEDERAL RULES

The facility is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

The facility is also subject to Federal regulations listed below.

NSPS Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The Greenhouse Gas (GHG) emissions from this facility are 14,655 TPY CO₂e and there is no GHG emissions increase. This renewal is not subject to PSD rules at 40 CFR 52.21

VI. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

The facility has submitted a timely and complete application to renew their operating permit and an application shield is in effect.

This operating permit also includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed

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compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which forms the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

VII. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

Table 1 - Operating Permit Revision History
New Jersey Department of Environmental Protection

Operating Permit Revision History

NOVELIS ALR ROLLED PRODUCTS, INC. PI 55796

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP240001	Minor Modification	<p>The following changes were made to the operating permit during this modification process:</p> <p>1. Equipment, emission points, and the associated emission units removed or decommissioned includes:</p> <ul style="list-style-type: none"> a. E101 – Office Hearing Boiler (PT1) (U1, OS1), b. E201 – Rolling Oil Htg. Boiler #1 (PT2) (U1, OS2), c. E202 – Rolling Oil Htg. Boiler #2 (PT2) (U1, OS3), d. E1801 – North Annealing Furnace (PT17, PT18) (U3, OS1), e. E2101 – South Annealing Furnace (PT20, PT21) (U3, OS2), f. E4001 – United Breakdown Mill (PT100) (U10, OS1), g. E4101 – United Foil Mill (PT100) (U10, OS2), h. E4401 – Slitter #1 (PT44001, PT44002, PT44003) (U44, OS1), i. E4402 – Coater Wash Tank (PT44001, PT44002, PT44003) (U44, OS2), j. E5101 – Roll Coater (PT5102) (U51, OS1), k. E5102 – Roll Coat Dryer (PT5102) (U51, OS2), l. E5301 – Storage Tank #6 (PT53) (U5, OS6), m. E5401 – Storage Tank #1 (PT54) (U5, OS1), n. E5501 – Storage Tank #2 (PT55) (U5, OS2), o. E5601 – Storage Tank #4 (PT56) (U5, OS4), p. E5701 – Storage Tank #3 (PT57) (U5, OS3), q. E5801 – Slitter #1 Oil Heater (PT58) (U1, OS5), r. E6001 – Slitter #2 Preheater (PT60) (U60, OS1), s. E6002 – Slitter #2 (PT60) (U60, OS2), and t. E6301 – Tool Room Safety Kleen Degreaser (PT6301) (U34, OS3). <p>2. Control Devices and emission points removed or decommissioned by the facility includes:</p> <ul style="list-style-type: none"> a. CD10 – Oil Mist Eliminator (PT100), b. CD4401 – Condensation Recovery System, and c. CD5101 – Regenerative Thermal Oxidizer (PT5102). <p>3. Updated facility contacts including:</p> <ul style="list-style-type: none"> a. Responsible Official & Air Permit Information Contact - Jeff Drzewiecki b. Fees/Billing Contact - Michael Clements 	1/9/2025

BOP230001	Administrative Amendment	<p>The following changes were made to the operating permit during this amendment process:</p> <ol style="list-style-type: none"> 1. Updated the Air Permit Information Contact (Richard Theriault); 2. Updated the Responsible Official Contact (Grady Johnson); 3. Removed the Title V Compliance Certification Contact; 4. Removed the Emissions Statements Contact; and 5. Removed the General Contact. 	9/13/2023
BOP210002	Administrative Amendment	<p>The following changes were made to the operating permit during this amendment process:</p> <ol style="list-style-type: none"> 1. The company name was changed from Aleris Rolled Products Inc to Novelis ALR Rolled Products, Inc. 2. Contact Information was updated to Thomas Ostrander (Air Permit Information Contact), Daniel Ballway (Fees/Billing Contact), and Bill Minogue (Responsible Official). 	1/21/2022
BOP200001	Administrative Amendment	This administrative amendment updates the Responsible Official contact (Dale Childress)	1/24/2020
BOP170001	Administrative Amendment	This administrative amendment updates the responsible official contact (Bruce Schlichter).	12/19/2017
BOP160001	Minor Modification	This minor modification removes a significant source diesel fire pump (old emission unit U61) and installs an insignificant source diesel fire pump (new IS61; 99 BHP, 74 kW), subject to NSPS Subpart IIII	9/16/2016

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements
that apply to an emission unit. An emission unit
may contain one or more pieces of equipment
and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules
and requirements that apply to a scenario. An operating
scenario represents various ways (or scenarios) a piece of
equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements