Division of Air Resources

Permit Review Report

Permit ID: 7-3556-00001/00097
Renewal Number: 2
03/01/2023

Facility Identification Data
Name: NOVELIS CORPORATION
Address: 448 CO RTE 1A
OSWEGO, NY 13126-0028

Owner/Firm
Name: NOVELIS CORPORATION
Address: 448 CO RTE 1A
OSWEGO, NY 13126, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: KEVIN M BALDUZZI
Address: NYSDEC - REGION 7
615 ERIE BLVD W
SYRACUSE, NY 13204
Phone:3154267493

Division of Air Resources:
Name: CHRISTOPHER W EIGHMEY
Address: 615 Erie Blvd W
Syracuse, NY 13204
Phone:3154267400

Air Permitting Contact:
Name: MARTIN MILLER
Address: NOVELIS CORPORATION
448 CO RTE 1A PO BOX 28
OSWEGO, NY 13126
Phone:

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

Attainment Status
NOVELIS CORPORATION is located in the town of SCRIBA in the county of OSWEGO.

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The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
The facility receives pre- and post-consumer scrap aluminum and produces sheet ingots that are rolled and finished in downstream processes or shipped to other Novelis facilities.

Permit Structure and Description of Operations
The Title V permit for NOVELIS CORPORATION
is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

NOVELIS CORPORATION is defined by the following emission unit(s):

Emission unit 0RMSOW - This furnace is designed to melt clean charge. A conveyor will be used to load aluminum, and a trough will be used to transfer molten aluminum to a crucible or directly to a process. There will be productivity gains in Remelt.

The emissions associated with SOW1 are 18.5 tpy of NOx; the emissions increase related to the remelt was 13.2 tons per year. The total increase in emissions was, at the time, was projected to be 13.2 tpy less than de minimis. The SOWMS melter is a Group 2 furnace, with a projected NOx emission rate of 4.2 lb/hr. This project occurred in 2007.

Emission unit 0RMSOW is associated with the following emission points (EP):
SOWM1
Process: SO1 is located at Building REMELT - A clean charge (Group 2) aluminum melting furnace with ultra-low NOx burners.

Emission unit 0SCALP - This emission unit consists of the ingot scalper chip storage and conveying system. This unit includes three storage silos controlled by two cyclones, also four screw conveyors and a chip bunker with individual cyclones controlled by a common baghouse.

Emission unit 0SCALP is associated with the following emission points (EP):
CHIP1, SILO1, SILO2
Process: SC1 is located at Building REMELT - This process consists of a 300,000 lb. silo and a 50,000 lb. silo used to temporarily store scalper chips. Scalper chips are conveyed from the scalping operation through a dedicated high-efficiency cyclone and into one of the silos. Scalper chips are screw fed into a blower which conveys the chips to one of 5 downstream locations in process sc2.

Process: SC2 is located at Building RECYCLE 2 - Scalper chips conveyed from the silos are fed into one of four screw conveyors or a chip bunker each controlled by an individual high efficiency cyclone. The screw conveyors are cycled such that one conveyor is filled with chips while the other screw conveyor feeds chips into the furnace. Two screw conveyors feed directly into the D Furnace sidewell (existing) and two screw conveyors feed directly into the E Furnace sidewell (existing). The fifth cyclone is associated with a chip bunker that may be utilized if one or both of the furnaces are not operating. All five of the high efficiency cyclones associated with this process (SC2) are exhausted through a dust collector (CTBH1 rated for 0.01 grains/dscf (Emission Point CHIP1).

Emission unit 3ANEAL - THIS EMISSION UNIT CONSISTS OF AN ELECTRIC ANNEALING FURNACE USED FOR TEMPERING COILED ALUMINUM SHEET.

Emission unit 3ANEAL is associated with the following emission points (EP):
0ANL3
Process: 0F3 is located at Building COLD MILL - Annealing furnace #3 is an electric annealing furnace utilizing 36 elements @ 73 KW per heat element. The furnace will be used to temper coiled sheet metal to customer specifications. Nitrogen cover gas will be supplied from either an existing nitrogen plant or from one of three Exogas Generators.

Emission unit DROSS1 - THIS IS AN ALUMINUM DROSS COOLING, STORAGE AND HANDLING FACILITY. IN THIS OPERATION ALUMINUM DROSS CONTAINED IN METAL PANS IS COVERED WITH SALT OR INERT GAS TO MINIMIZE OXIDATION DURING COOLING. FOLLOWING COOLING THE DROSS IS TRANSFERRED TO TEMPORARY STORAGE BINS

WHICH ARE SUBSEQUENTLY DUMPED INTO TRUCKS OR RAIL CARS FOR SHIPMENT TO OFF-SITE RECYCLING OPERATIONS. EMISSION POINT 0DCR3 IS THE ONLY EMISSION POINT IN THIS EMISSION UNIT.

Emission unit DROSS1 is associated with the following emission points (EP):
0DCR3
Process: DRS is located at GROUND, Building DROSS - THIS IS AN ALUMINUM DROSS COOLING, STORAGE AND HANDLING FACILITY. IN THIS OPERATION ALUMINUM DROSS CONTAINED IN METAL PANS IS COVERED WITH SALT OR INERT GAS TO MINIMIZE OXIDATION DURING COOLING. FOLLOWING COOLING THE DROSS IS TRANSFERRED TO TEMPORARY STOR AGE BINS WHICH ARE SUBSEQUENTLY DUMPED INTO TRUCKS OR RAIL CARS FOR SHIPMENT TO OFF-SITE RECYCLING OPERATIONS. EMISSION POINT 0DCR3 IS THE ONLY EMISSION POINT ASSOCIATED WITH THIS PROCESS.

Emission unit FINISH - This emission unit consists of a new tension leveler, with an associated cleaning station, a slitter for performing various shear cuts (e.g., length, width) to coiled aluminum sheets, and an automated packaging line that will package the coils prior to shipment.

The tension leveler consists of unwind and rewind segments, slitting equipment, and a cleaning station (TL3CS). The cleaning station consists of the application of a solvent within an enclosure controlled by a demister (TL3ME). Solvent applied to the aluminum sheet is drawn through an impinger, aluminum mesh filters, and Vee bag filters before being exhausted inside the building. Scrap from the tension leveler is controlled via a quickdraft (TL3QD) system and collected in scrap boxes inside the Cold Mill building.

Emission unit FINISH is associated with the following emission points (EP):
00QD4
Process: TL3 is located at Building COLD MILL - The tension leveler consists on an unwind section, a cleaning section, and a rewind section. Scrap is conveyed via a quickdraft system (TL3QD) and collected in scrap boxes. The air exhausts out 00QD4.

Emission unit HOTMIL - THIS PROCESS CONSISTS OF A MULTI-STAND ALUMINUM HOT ROLLING MILL, SHEARS, TRIMMERS, OIL FILTRATION AND TREATMENT, ULTRAFILTRATION AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS, AND SHIPPING/RECEIVING. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS ALUMINUM INGOTS ARE ROLLED INTO ALUMINUM SHEET. EMISSION POINTS 00HMS, HM105, HM106, HM121, HM122 AND HM123 ARE INCLUDED IN THIS EMISSION UNIT. EMISSION POINTS HM105 AND HM106 ARE SUBJECT TO 6 NYCRR 212 VOC RACT REQUIREMENTS.

A PiTTek Rolling Mill Fume Exhaust System (RME-4) will be installed to control emissions from the 100 inch hot mill, replacing two existing Busch Air Purifiers. The RME-4 will be equipped with mist eliminators in the duct and the stack as well as a stack condensate eliminator.

Two Busch Purifier units rated at 90,000 CFM each will be replaced with a single fume exhaust system rated at 285,000 CFM. Emission Points HM105 and HM106 will be eliminated and replaced with a new emission point (HMFE1). Additional collection points will be added to improve fume capture efficiency. Emission sources HM10P and HM11P will be eliminated and replaced with HMME1, HMME2 and

HMMES.

Emission unit HOTMIL is associated with the following emission points (EP):
00HMS, HM121, HM122, HM123, HMFE1
Process: HOT is located at GROUND, Building HOT MILL - THIS PROCESS CONSISTS OF A MULTI-STAND ALUMINUM HOT ROLLING MILL, SHEARS, TRIMMERS, OIL FILTRATION AND TREATMENT, ULTRAFILTRATION AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS ALUMINUM INGOTS ARE ROLLED INTO ALUMINUM SHEET. EMISSIONS FROM THE VARIOUS PROCESS OPERATIONS ARE BY VENTILATION SYSTEMS CONSISTING OF HOODS, ENCLOSURES, DUCTWORK, FANS INTERTIAL SEPARATORS AND/OR EXHAUST STACKS. EMI SSION POINTS 00HMS, HM105, HM106, HM121, HM122 AND HM123 AND ASSOCIATED WITH THIS PROCESS.

Two Busch Purifier units rated at 90,000 CFM each will be replaced with a single fume exhaust system rated at 285,000 CFM. Emission Points HM105 and HM106 will be eliminated and replaced with a new emission point (HMFE1). Additional collection points will be added to improve fume capture efficiency. Emission sources HM10P and HM11P will be eliminated and replaced with HMME1, HMME2 and HMMES.

Emission unit INPREP - THIS PROCESS CONSISTS OF SCALPER (MILLING) MACHINES AND ASSOCIATED ALUMINUM CHIP HANDLING SYSTEMS WHICH MACHINE SURFACES OF ALUMINUM INGOTS IN PREPARATION FOR HOT ROLLING. THE PROCESS ALSO INCLUDES SEVERAL NATURAL GAS OR PROPANE FUELED HOMOGENIZING FURNACES UTILIZED TO PREHEAT AND CONDITION ALUMINUM INGOTS PRIOR TO HOT ROLLING, AND SHIPPING/RECEIVING. VARIOUS MAINTENANCE AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. THE FOLLOWING EMISSION POINTS ARE INCLUDED IN THIS EMISSION UNIT: P0102, P0304, P0506, P0708, P0910, P1112, P1314, P1516, P1718, P1920, P2122, AND PUSH1.

Emission unit INPREP is associated with the following emission points (EP):
P0102, P0304, P0506, P0708, P0910, P1112, P1314, P1516, P1718, P1920, P2122, PUSH1
Process: INP is located at GROUND, Building INGOT PREP - THIS PROCESS CONSISTS OF SCALPER (MILLING) MACHINES AND ASSOCIATED ALUMINUM CHIP HANDLING SYSTEMS WHICH MACHINE SURFACES OF ALUMINUM INGOTS IN PREPARATION FOR HOT ROLLING. THIS PROCESS ALSO INCLUDES SEVERAL NATURAL GAS OR PROPANE FUELED HOMOGENIZING FURNA CES UTILIZED TO PREHEAT AND CONDITION ALUMINUM INGOTS PRIOR TO HOT ROLLING. VARIOUS MAINTENANCE AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. THE FOLLOWING EMISSION POINTS ARE ASSOCIATED WITH THIS PROCESS: P0102, P0304, P0506, P0708, P091 0, P1112, P1314, P1516, P1718, P1920, P2122, PUSH1 AND 000E3.

Emission unit RC2CLD - This is an aluminum scrap shredding and separation process consisting of a pre-shredder (proposed), a primary shredder, a bale breaker, rotary shears, a trommel classifier, magnetic separators, air classifiers, screens, conveyors, shipping/receiving, and storage hoppers. Various maintenance, testing and offices are also included in this emission unit. Particulate emissions from this emission unit are collected by a ventilation system consisting of hoods, enclosures, ductwork, fan, 2

cyclones (up stream of the baghouse) and baghouse. Emission point RCC02 is the only emission point in this emission unit. The RC2CLD and RC2HOT emission units were constructed simultaneously as a single project and emissions from both units were combined in assessing applicability of 6 NYCRR 231 and Federal PSD. Federally enforceable emission limits were established to maintain deminimis emission levels for the total emissions from both units.

Emission unit RC2CLD is associated with the following emission points (EP):
RCC02
Process: R2C is located at GROUND, Building RECYCLE 2 - This is an aluminum scrap shredding and separation process consisting of a bale breaker, rotary shears, a trommel classifier, magnetic separators, air classifiers, screens, conveyors and storage hoppers. Various maintenance, testing and offices are also Included in this emission unit. Particulate emissions from this emission unit are collected by a ventilation system consisting of hoods, enclosures, ductwork, fan and baghouse. Emission point RCC01 is the only emission point associated with this process.

Emission unit COLD72 - THIS PROCESS CONSISTS OF A 72" WIDE ALUMINUM COLD ROLLING MILL, ANNEALING FURNACES, SHEARS, TRIMMERS, TENSION LEVELERS, SLITTERS, LUBRICATION SYSTEMS, OIL FILTRATION AND DISTILLATION EQUIPMENT AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS, AND SHIPPING/RECEIVING. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS COILED ALUMINUM SHEET IS ROLLED TO A REDUCED THICKNESS PRODUCING COILS OF ALUMINUM SHEET. THESE COILS ARE SUBSEQUENTLY PROCESSED THROUGH ANNEALING, TRIMM ING, SLITTING AND/OR LUBRICATING OPERATIONS PRIOR TO PACKAGING IN PREPARATION FOR SHIPMENT TO THE CUSTOMER. EMISSIONS FROM THE VARIOUS PROCESS OPERATIONS ARE BY VENTILATION SYSTEMS CONSISTING OF HOODS, ENCLOSURES, DUCTWORK FANS INERTIAL SEPARATORS AND/OR EXHAUST STACKS. EMISSION POINTS 0000A, 00QDA, 00QDD, AND 0ANL1 ARE INCLUDED IN THIS EMISSION UNIT. THIS EMISSION UNIT UTILIZES BACT FOR VOC EMISSIONS CONTROL AS DEMONSTRATED IN ALCAN'S 1994 VOC RACT PLAN WHICH WAS SUBMITTED TO, AND APPROVED BY, DEC. BASED ON THE RECEIPT OF A COMPLETENESS DETERMINATION FROM DEC ON ITS PHASE 1 APPLICATION BEFORE 4/22/98, THE REQUIREMENT FOR CAM PLAN FOR EMISSION POINT 0000A IS DEFERRED UNTIL TITLE V PERMIT RENEWAL.

This emission unit consists of a natural gas fired annealing furnace for tempering coiled aluminum sheets to customer specifications. Nitrogen will be supplied to the furnace from either an existing nitrogen plant or from one of the three Exogas generators. The emissions from the generators will be discharged directly into the annealing furnace.

Emission unit COLD72 is associated with the following emission points (EP):
0000A, 00QDA, 00QDD, 0ANL1
Process: C72 is located at GROUND, Building COLD MILL - THIS PROCESS CONSISTS OF A 72" WIDE ALUMINUM COLD ROLLING MILL, ANNEALING FURNACE, SHEARS, TRIMMERS, TENSION LEVELERS, SIFTERS, LUBRICATION SYSTEMS, OIL FILTRATION AND DISTILLATION EQUIPMENT AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS COILED ALUMINUM SHEET IS ROLLED TO A REDUCED THICKNESS PRODUCING COILS OF ALUMINUM SHEET. THESE

COILS ARE SUBSEQUENTLY PROCESSED THROUGH ANNEALING, TRIMMIN G, SIFTING AND/OR LUBRICATING OPERATIONS PRIOR TO PACKAGING IN PREPARATION FOR SHIPMENT TO THE CUSTOMER. EMISSIONS FROM THE VARIOUS PROCESS OPERATIONS ARE BY VENTILATION SYSTEMS CONSISTING OF HOODS, ENCLOSURES, DUCTWORK, FANS, STACKS AND ASSOCIATED POLLUT ION CONTROL EQUIPMENT. EMISSION POINTS 0000A, 00QDA, 00QDD, AND 0ANL1 ARE ASSOCIATED WITH THIS PROCESS.

Annealling furnace 1 is a natural gas fired annealing furnace for tempering coiled aluminum sheets to customer specifications. Nitrogen will be supplied to the furnace from either an existing nitrogen plant or from one of the three Exogas generators.

Emission unit COLD88 - THIS PROCESS CONSISTS OF AN 88" WIDE ALUMINUM COLD ROLLING MILL, ANNEALING FURNACE, SHEARS, TRIMMERS, TENSION LEVELERS, SLITTERS, LUBRICATION SYSTEMS, OIL FILTRATION AND DISTILLATION EQUIPMENT AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS, AND SHIPPING/RECEIVING. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS COILED ALUMINUM SHEET IS ROLLED TO A REDUCED THICKNESS PRODUCING COILS OF ALUMINUM SHEET. THESE COILS ARE SUBSEQUENTLY PROCESSED THROUGH ANNEALING, TRIMMING, SLITTING AND/OR LUBRICATING OPERATIONS PRIOR TO PACKAGING IN PREPARATION FOR SHIPMENT TO THE CUSTOMER. EMISSIONS FROM THE VARIOUS PROCESS OPERATIONS ARE BY VENTILATION SYSTEMS CONSISTING OF HOODS, ENCLOSURES, DUCTWORK, FANS INERTIAL SEPARATORS AND/OR EXHAUST STACKS. EMISSION POINTS OCM88, 00QDB AND 0ANL2 ARE INCLUDED IN THIS EMISSION UNIT. THIS EMISSION UNIT UTILIZES BACT FOR VOC EMISSIONS CONTROL AS DEMONSTRATED IN ALCAN'S 1994 VOC RACT PLAN WHICH WAS SUBMITTED TO, AND APPROVED BY, DEC. BASED ON THE RECEIPT OF A COMPLETENESS DETERMINATION FROM DEC ON ITS PHASE 1 APPLICATION BEFORE 4/22/98, THE REQUIREMENT FOR CAM PLAN FOR EMISSION POINT 0CM88 IS DEFERRED UNTIL TITLE V PERMIT RENEWAL.

This emission unit consists of a natural gas fired annealing furnace for tempering coiled aluminum sheets to customer specifications. Nitrogen will be supplied to the furnace from either an existing nitrogen plant or from one of the three Exogas generators. The emissions from the generators will be discharged directly into the annealing furnace.

Emission unit COLD88 is associated with the following emission points (EP):
00QDB, 0ANL2, 0CM88
Process: C88 is located at GROUND, Building COLD MILL - THIS PROCESS CONSISTS OF A 88" WIDE ALUMINUM COLD ROLLING MILL, ANNEALING FURNACE, SHEARS, TRIMMERS, TENSION LEVELERS, SIFTERS, LUBRICATION SYSTEMS, OIL FILTRATION AND DISTILLATION EQUIPMENT AND ASSOCIATED MATERIAL HANDLING AND PACKAGING SYSTEMS. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. IN THIS PROCESS COILED ALUMINUM SHEET IS ROLLED TO A REDUCED THICKNESS PRODUCING COILS OF ALUMINUM SHEET. THESE COILS ARE SUBSEQUENTLY PROCESSED THROUGH ANNEALING, TRIMMING, SIFTING AND/OR LUBRICATING OPERATIONS PRIOR TO PACKAGING IN PREPARATION FOR SHIPMENT TO THE CUSTOMER. EMISSIONS FROM THE VARIOUS PROCESS OPERATIONS ARE BY VENTILATION SYSTEMS CONSISTING OF HOODS, ENCLOSURES, DUCTWORK,

FANS, STACKS AND ASSOCIATED POLLUT ION CONTROL EQUIPMENT. EMISSION POINTS 00CM88, 00QDB, AND 0ANL2 ARE ASSOCIATED WITH THIS PROCESS.

Annealing Furnace 1 is a natural gas fired annealing furnace for tempering coiled aluminum sheets to customer specifications. Nitrogen will be supplied to the furnace from either an existing nitrogen plant or from either an existing nitrogen plant or from one of three Exogas generators.

Emission unit NPUSHR - New Pusher furnace (PUSH2) for preheating ingots prior to rolling.

Process: PF2 is located at Building INGOT PREP - The pusher furnace PUSH2 is used to preheat aluminum ingots prior to rolling.

Emission unit RC2HOT - This is an aluminum scrap delacquering and melting process consisting of a rotary kiln, two sidewell aluminum furnaces and various material separation and handling systems. Various maintenance, testing and office facilities are also included in this emission unit. VOC emissions from the kiln are controlled by an afterburner and HCl emissions are controlled using a sodium bicarbonate injection system. Particulate emissions from this emission unit are collected by a ventilation system consisting of hoods, enclosures, ductwork, fan and baghouse. Emission points included in this emission unit are: RCH01, RCBP1, RCBP2 and RCBP3. RCBP1, RCBP2 and RCBP3 are emergency vents and exempt as defined by 6 NYCRR part 201-3.2, sources RC2FD and RC2FE (furnaces D and E) associated with emission point RCH01 are equipped with Bloom Gemini low NOx regenerative burners in fulfillment of RACT requirements. These burners were replaced with bloom 1151-200 ultra3 low NOx lumiflame regenerative burners in 1999 which further reduced NOx emissions. The maximum heat input to each burner/furnace is being increased from 15 to 20 mmBtu/hr with the 2017 modification. The RC2CLD and RC2HOT emission units were constructed simultaneously as a single project and emissions from both units were combined in assessing applicability of 6 NYCRR 231 and Federal PSD. Federally enforceable emission limits were established to maintain deminimis emission levels for the total emissions from both units.

Emission unit RC2HOT is associated with the following emission points (EP):
RCB01, RCBP1, RCBP2, RCBP3, RCH01
Process: R2H is located at GROUND, Building RECYCLE 2 - This is an aluminum scrap delacquering and melting process consisting of a rotary kiln, two side-well aluminum melting furnaces and various material separation and handling systems. Various maintenance, testing and office facilities are also included in t his process. VOC emissions from the kiln are controlled by an afterburner and HCl emissions are controlled using a sodium bicarbonate injection system. Particulate emissions from this emission unit are collected by a ventilation system consisting of hoods , enclosures, ductwork, fan and baghouse. Emission points associated with this process include: RCH01, RCBP1, RCBP2 and RCBP3. RCBP1, RCBP2 and RCBP3 are emergency vents and exempt as defined by 6 NYCRR part 201-3.2. RCB01 is an exhaust from a sodium bicarbonate bin vent filter and is also exempt as defined by 6 NYCRR part 201-3.2. annual NOx emissions are limited to 39.9 tons/yr by permit condition.

Emission unit 0000CL - This Emission Unit consists of three aluminum finishing lines designed to meet product specifications. The operations involved in each line include: annealing, surface preparation, other mechanical processes and numerous small combustion devices that would otherwise be exempt.

Emission unit 0000CL is associated with the following emission points (EP):
01FCE, 01SCR, 01TRM, 02FCE, 02SCR, 02TRM, 03FCE, 03SCR, 03TRM
Process: CL1 is located at Building CL - Process CL1 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL1 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C1FCE) utilizes low-NOx burners. Furnace emissions shall pass through a recouperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C1CON), cleaning (C1PCL), and applicator (C1CTR) emission sources are directed through a common wet scrubber with a demister (SCR1P). Scrap from the trimmer (C1TRM) is directed to a cyclone (TRM1P) and directed into scrap boxes. The reluber (C1RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB1P) and vented inside the building. This process also includes three hot water generators that are exempt from the permitting requirements provided in 6 NYCRR Part 201.

Process: CL2 is located at Building CL - Process CL2 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL2 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C2FCE) utilizes low-NOx burners. Furnace emissions shall pass through a recouperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C2CON), cleaning (C2PCL), and applicator (C2CTR) emission sources are directed through a common wet scrubber with a demister (SCR2P). Scrap from the trimmer (C2TRM) is directed to a cyclone (TRM2P) and directed into scrap boxes. The reluber (C2RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB2P) and vented inside the building. This process also includes three hot water generators that are exempt from the permitting requirements provided in 6 NYCRR Part 201.

Process: CL3 is located at Building CL - Process CL3 consists of various combustion and process emission sources associated with aluminum finishing operations. The finishing operations included in process CL3 include annealing, surface preparation, and other mechanical processes. The annealing furnace (C3FCE) utilizes low-NOx burners. Furnace emissions shall pass through a recouperator, which provides an energy benefit. Emissions (Non-VOC) from the surface preparation (C3CON), cleaning (C3PCL), and applicator (C3CTR) emission sources are directed through a common wet scrubber with a demister (SCR3P). Scrap from the trimmer (C3TRM) is directed to a cyclone (TRM3P) and directed into scrap boxes. The reluber (C3RLB) is used to apply lubrication to the sheet at the end of the process. Emissions from the reluber are directed to a demister (RLB3P) and vented inside the building. This process also includes three hot water generators that are exempt from the permitting requirements provided in 6 NYCRR Part 201.

Process: SDR is located at Building CL - The scrap dryers remove moisture from automotive scrap prior to processing in Recycle 1 furnaces F and G. The scrap ranges from 1" by 1" to 4" by 18." The scrap can be fed directly to the furnace or stored.

Emission unit 000DC7 - The 0-00DC7 emission unit consists of two (2) melting furnaces and two (2) in-line fluxers for the processing of aluminum scrap and molten aluminum.

The SMACT defines melting/holding furnace as “a group 1 furnace that processes only clean charge, performs melting, holding, and fluxing functions, and does not transfer molten aluminum to or from another furnace except for purposes of alloy changes, off-specification product drains, or maintenance activities.” Furnaces under this definition are subject to a limit of 0.80 pounds PM per ton, double the limit

that other group 1 furnaces must meet. The melters and holders 4, 5 and 6 at Novelis are Group 1 furnaces subject to a limit of 0.40 lb PM/ton because they can process other than clean charge.

Emission unit 000DC7 is associated with the following emission points (EP):
EP720, EP760
Process: P01 is located at Building REMELT - A 60 metric ton melter/holder Group 1 furnace fired by natural gas, with an in-line fluxer.

Process: P02 is located at Building REMELT - A 60 metric ton melter/holder Group 1 furnace with an in-line fluxer and a 20 metric ton melter/holder Group 1 furnace with an in-line fluxer.

Process: P03 is located at Building REMELT - A 20 metric ton melter/holder Group 1 furnace fired by natural gas, with an in-line fluxer.

Emission unit 000RC1 - This is an aluminum scrap melting process consisting of two, sidewell melting furnaces fueled by oil and/or natural gas, and scrap handling, shipping/receiving, and molten metal handling equipment. Various maintenance, testing and office facilities are also included in this emission unit. The aluminum scrap melted in the two sidewell furnaces may contain small quantities of oil or lacquer coatings. Emissions from the furnace side-well melting systems are collected by a ventilation system consisting of hoods, enclosures, ductwork, fan and baghouse. This emission unit includes emission points NR1F0, NR1F1, NR1G0, NR1G1, 00R21. Sources 0RC1F and 0RC1G associated with emission points NR1F0 and NR1G0 are equipped with bloom 1150-150 ultra 3 low NOx lumiflame regenerative burners in fulfillment of RACT requirements. Emission tests of these burners as installed by the manufacturer confirmed NOx emissions of 0.045 lb/mmBTU for natural gas and 0.052 lb/mmBTU for oil.

Emission unit 000RC1 is associated with the following emission points (EP):
000E2, 00R21, 0SOW2, NR1F0, NR1F1, NR1G0, NR1G1
Process: 0BH is located at Building RECYCLE 1 - This process involves the operation of the melting furnace F and G side wells and their associated baghouse (RC1BH).

Process: MHF is located at Building RECYCLE 1 - This process involves main hearth operation of Melting Furnace F.

Process: MHG is located at Building RECYCLE 1 - This process involves main hearth operation of Melting Furnace G.

Process: RC1 is located at GROUND, Building RECYCLE 1 - This is an aluminum scrap melting process consisting of two, side-well melting furnaces fueled by oil and/or natural gas, one natural gas fired melting furnace, one aluminum sow drying oven and scrap handling and molten metal handling equipment. Various maintenance, testing and office facilities are also included in this emission unit. The aluminum scrap melted in these furnaces may contain small quantities of oil or lacquer coatings. Emissions from the furnace side-well melting systems are collected by a ventilation system consisting of hoods, enclosures, ductwork, fan and baghouse. Emission points associated with this process include: NR1F0, NR1F1, NR1G0, NR1G1, 00R21, 000E2 and 0SOW2 as well as the following emission points which were physically removed in 1996: 00151, 00152, 0SDC1, 0SDC2, 0SDC3.

Emission unit 0ANEAL - THIS EMISSION UNIT CONSISTS OF THREE (3) NATURAL

GAS FIRED BATCH ANNEALING FURNACES USED FOR TEMPERING COILED ALUMINUM SHEET. THE DESIGN CAPACITY OF EACH ANNEALING FURNACE IS APPROXIMATELY 100 TONS OF ALUMINUM.

Emission unit 0ANEAL is associated with the following emission points (EP):
0ANL4, 0ANL5, 0ANL6
Process: ANL is located at Building COLD MILL - ANNEALING FURNACES 4, 5, AND 6 ARE NATURAL GAS FIRED ANNEALING FURNACES. THE FURNACES WILL BE USED TO TEMPER COILED SHEET METAL TO CUSTOMER SPECIFICATIONS.

Emission unit REMELT -

Emission unit REMELT is associated with the following emission points (EP):
00FH4, 00FH5, 00FM4, 00FM5, 00FM6
Process: RMT is located at GROUND, Building REMELT - THIS IS AN ALUMINUM SCRAP MELTING AND CASTING FACILITY CONSISTING OF SEVERAL ALUMINUM SCRAP MELTING FURNACES, HOLDING FURNACES, MOLTEN METAL TREATMENT EQUIPMENT, MATERIAL HANDLING FACILITIES AND DIRECT-CHILL CASTING PITS. THESE FURNACES ARE FUELED BY OIL AND/OR NATURAL GAS. VARIOUS COOLING WATER SUPPLY AND TREATMENT SYSTEMS ARE ALSO ASSOCIATED WITH THIS UNIT. VARIOUS MAINTENANCE, TESTING AND OFFICE FACILITIES ARE ALSO INCLUDED IN THIS EMISSION UNIT. ALUMINUM SCRAP AND MOLTEN ALUMINUM ARE TRANSFERRED INTO THESE FURNACES. VARIOUS ALLOYING METALS ARE ADDED TO ADJUST THE COMPOSITION OF THE MOLTEN METAL. VARIOUS METAL TREATMENT OPERATIONS INCLUDING SALT AND/OR CHLORINE FLUXING, FILTRATION AND DEGASSING ARE CONDUCTED PRIOR TO CASTING THE METAL INTO ALUMINUM ING OTS. THIS PROCESS IS COVERED UNDER A FEDERAL HAP EARLY REDUCTIONS PROGRAM TITLE V PERMIT NO. ERP-NY001. EMISSION POINTS ASSOCIATED WITH THIS PROCESS INCLUDE: 00FH3, 00FH4, 00FH5, 00FM3, 00FM4, 00FM5 AND 00FM6. ALSO INCLUDED ARE THE FOLLOWING EMISSION POIN TS THAT WERE PHYSICALLY REMOVED IN 1992: 00FH1, 00FH2, 00FM1 AND 00FM2.

Title V/Major Source Status
NOVELIS CORPORATION is subject to Title V requirements. This determination is based on the following information:
The facility is major for PM, PM10, PM2.5, SO2, NOx, CO, VOC, HAP and CO2e.

Program Applicability
The following chart summarizes the applicability of NOVELIS CORPORATION with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability

PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3341	SECONDARY NONFERROUS METALS
3353	ALUMINUM SHEET PLATE & FOIL

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-04-001-03	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Smelting Furnace/Reverberatory
3-04-001-04	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Fluxing: Chlorination
3-04-001-12	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Annealing Furnace
3-04-001-14	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Pouring/Casting
3-04-001-31	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM SECONDARY METAL PROD:SECONDARY ALUMINUM

	PROD:RAW MATERIAL CHARGING
3-04-001-50	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Rolling/Drawing/Extruding
3-04-001-60	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM MATERIAL HANDLING
3-04-001-99	SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - ALUMINUM Other Not Classified
4-01-003-98	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
051207-31-9	2,3,7,8-TETRACHLORODIBENZOFURAN	0.0001		0.0001	
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	0.0001			
0NY504-00-0	40 CFR 63 - TOTAL HYDROCARBONS (THC)	0.0001		0.0001	
007440-38-2	ARSENIC	0.25		0.21	
007440-43-9	CADMIUM	0.24		0.2	
000630-08-0	CARBON MONOXIDE	810000		131542	
007782-50-5	CHLORINE	8100		6365	
007440-47-3	CHROMIUM	3.2		2.7	
000071-55-6	ETHANE, 1,1,1-TRICHLORO	35		0.0001	
000075-34-3	ETHANE, 1,1-DICHLORO-	35		23	
000075-00-3	ETHANE,	7.88		0.0001	

000075-35-4	CHLORO ETHENE,1,1-DICHLORO	35		0.0001
068188-85-2	FLUORIDES	5800		
007647-01-0	HYDROGEN CHLORIDE	82064		68812
007664-39-3	HYDROGEN FLUORIDE			709
007439-92-1	LEAD	9.9		
007439-96-5	MANGANESE	3.7		3.1
007439-97-6	MERCURY	0.12		0.1
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	0.12		0.1
0NY090-00-0	OIL MIST	0.001		
0NY210-00-0	OXIDES OF NITROGEN	650000		
0NY075-00-0	PARTICULATES	540000		
0NY075-02-5	PM 2.5	522000		
0NY075-00-5	PM-10	540000		
007446-09-5	SULFUR DIOXIDE	3375		
007664-93-9	SULFURIC ACID	0.0001		0.0001
0NY100-00-0	TOTAL HAP	21000		75892
0NY998-00-0	VOC		244000	157137

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit

renewal application.

Item E: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: **Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: **Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: **Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: **Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	104	Powers and Duties of the Department with respect to air pollution control
0-ANEAL	40CFR 60-Dc.48c(a)	100	Reporting and Recordkeeping Requirements.
0-ANEAL	40CFR 60-Dc.48c(g)	101	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-DDDDD	56, 57	Boilers and Process Heaters Major Source NESHAP rule (current version)
FACILITY	40CFR 63-RRR.1505(a)	58, 59, 60	Emission Standards for Affected Sources and Emission Units
FACILITY	40CFR 63-RRR.1505(b)	61, 62	Aluminum Scrap Shredder Emission Standards
FACILITY	40CFR 63-RRR.1505(e)	63	Scrap dryer/delacquering kiln/decoating kiln: alternative limits
FACILITY	40CFR 63-RRR.1505(i)	64, 65, 66	Group 1 Furnace Emission Standards
FACILITY	40CFR 63-RRR.1505(k)	67, 68, 69	Secondary Aluminum Processing Unit Emission Standard
FACILITY	40CFR 63-RRR.1506(b)	70	Operating requirements - Labeling
FACILITY	40CFR 63-RRR.1506(c)	71	Capture /Collection System Operating Requirements
FACILITY	40CFR 63-RRR.1506(d)	72	Operating requirements - Feed/charge weight
FACILITY	40CFR 63-RRR.1506(e)	73	Aluminum Scrap Shredder - Operating Requirements
FACILITY	40CFR 63-RRR.1506(g)	74	Scrap dryer/delacquering kiln/decoating kiln - Operating requirements
FACILITY	40CFR 63-RRR.1506(m)	75	Operating Req'ts - Group 1 Furnace w/ Add-on Air Pollution Control Device
FACILITY	40CFR 63-RRR.1506(n)	76	Operating requirments for Group 1 Furnaces w/out add-on air pollution control devices
FACILITY	40CFR 63-RRR.1506(p)	77	Operating

FACILITY	40CFR 63-RRR.1510(b)	78	requirements - Corrective Action Monitoring and Compliance Requirements - OM&M Plan
FACILITY	40CFR 63-RRR.1510(f)	79	Monitoring requirements - Fabric filters and lime injected fabric filters
FACILITY	40CFR 63-RRR.1510(g)	80	Monitoring requirements - Afterburner
FACILITY	40CFR 63-RRR.1510(h)	81	Monitoring requirements - Fabric filter inlet temperature
FACILITY	40CFR 63-RRR.1510(i)	82	Monitoring requirements - Lime injection
FACILITY	40CFR 63-RRR.1510(j)	83	Monitoring Requirements - Total reactive flux injection rate
FACILITY	40CFR 63-RRR.1510(n)	84	Monitoring requirements - Sidewell group 1 furnace with add-on air pollution control devices.
FACILITY	40CFR 63-RRR.1510(o)	85	Site-specific monitoring plan requirments for Group 1 furnaces w/out add-on control devices.
FACILITY	40CFR 63-RRR.1510(q)	86	Monitoring of scrap contamination level by calculation method for Group 1 furnaces w/o add-on control devices.
FACILITY	40CFR 63-RRR.1510(t)	87	Secondary Aluminum Processing Unit Emission Limits
FACILITY	40CFR 63-RRR.1511	88	Performance test/compliance general requirements.
FACILITY	40CFR 63-RRR.1512	89	Performance test/compliance demonstration requirements and procedures.
FACILITY	40CFR 63-RRR.1513	90	Equations for determining compliance
FACILITY	40CFR 63-RRR.1514	91	Change of furnace classification
FACILITY	40CFR 63-RRR.1515(b)	92	Notifications - Notification of Compliance Status Report
FACILITY	40CFR 63-RRR.1516	93	Secondary Aluminum MACT Reports
FACILITY	40CFR 63-RRR.1517	94	Secondary Aluminum

			MACT Records
FACILITY	40CFR 63-RRR.1518	95	Applicability of general provisions.
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 82-F	19	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1, 20	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	105	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 96, 97	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	23, 24	Operational Flexibility
FACILITY	6NYCRR 201-6.4(g)	25	Permit Shield
FACILITY	6NYCRR 201-7	26	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.4(a)(3)	44	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.

FACILITY	6NYCRR 211.1	106	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	45	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6(a)	46, 47	Limiting of Opacity
FACILITY	6NYCRR 212-2.4(a)	48	Control of Particulate from Existing Process Emission Sources
FACILITY	6NYCRR 212-2.4(b)	49	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1(a)(2)	50, 51	RACT applicability for facilities outside of Lower Orange Co and NYC Metro area
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-2	52	Fuel Composition and Use - Waste Oil as a Fuel
FACILITY	6NYCRR 227-2.4(d)	53	Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 227-2.4(g)	54	Other combustion installations.
H-OTMIL	6NYCRR 231-11.2	102	Reasonable Possibility requirements for insignificant mods
FACILITY	6NYCRR 231-11.2(c)	55	Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions

Applicability Discussion:
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and

monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except

for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, NOVELIS CORPORATION has been determined to be subject to the following regulations:
40 CFR 60.48c (a)
This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

40 CFR 60.48c (g)
The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 63.1505 (a)
This citations states the applicability of emission standards.

40 CFR 63.1505 (b)
This citation states the emission standards for aluminum scrap shredders.

40 CFR 63.1505 (e)
This citation states the alternative limits for scrap dryers/delacquering kilns/decoating kilns.

40 CFR 63.1505 (i)
This sets the emission limits from a group 1 furnace . These limits are the standard against which the calculated emissions emitted from the Secondary Aluminum Processing Unit (SAPU) are held to.

40 CFR 63.1505 (k)
This section of the secondary aluminum MACT contains the standards for secondary aluminum processing units (SAPU) which are defined as all the group 1 furnaces and in-line fluxers within the facility. Emission limits are provided in §1505(i) and (j) for each individual furnace or fluxer. The equations in this paragraph show how they are combined to arrive at an overall limit for the SAPU.

40 CFR 63.1506 (b)
This condition states a facility must label the equipment with the proper operating procedures in order to maintain compliance with this regulation.

40 CFR 63.1506 (c)
Conditions under this rule incorporate the operating requirements for capture and collection systems associated with add-on air pollution control devices used to comply with the secondary aluminum production requirements.

40 CFR 63.1506 (d)
This condition states the facility must be able to accurately measure the weight of the aluminum feed/charge or throughput in order to determine compliance with emission limits.

40 CFR 63.1506 (e)
This section states the operating requirements for an aluminum scrap shredder with emissions controlled by a fabric filter considering the type of monitoring selected.

40 CFR 63.1506 (g)
This section states the operating requirements for a scrap dryer/delacquering kiln/decoating kiln controlled by an afterburner and a lime-injected fabric filter.

40 CFR 63.1506 (m)
Conditions under this rule incorporate operating requiirements for group 1 furnaces with add-on air pollution control devices.

40 CFR 63.1506 (n)
This condition requires how the group 1 furnace without add on pollution control equipment, should be operated to ensure compliance.

40 CFR 63.1506 (p)
This condition states when a device is not operating properly, it must be fixed.

40 CFR 63.1510 (b)
This condition states a facility must have a written plan to operate and maintain all the equipment properly and it must be approved by the department.

40 CFR 63.1510 (f)
This section states the monitoring requirements for fabric filters and lime injected fabric filters, considering the type of monitoring chosen.

40 CFR 63.1510 (g)
This section states the monitoring requirements using an afterburner as an emission control device.

40 CFR 63.1510 (h)
This section states the requirements for monitoring inlet temperature to a fabric filter control device.

40 CFR 63.1510 (i)
This section states the requirements for monitoring the lime injection system when using a lime-injected fabric filter as an emission control device.

40 CFR 63.1510 (j)
This condition states accurate scales must be installed to measure the weight of aluminum produced. The weight of the aluminum produced will be used to calculate emissions to show compliance with the emission limits.

40 CFR 63.1510 (n)
This section states the requirements for monitoring molten metal level for a sidewell group 1 furnace during reactive fluxing.

40 CFR 63.1510 (o)
This condition outlines what information should be included in a Site Specific Monitoring (SSM) Plan.

40 CFR 63.1510 (q)
This citation states procedures for substituting a scrap contaminant monitoring program for a scrap inspection program.

40 CFR 63.1510 (t)
This condition tells the facility how to calculate the particulate matter (PM), Hydrogen Chloride (HCl) and Dioxins/Furans (D/F) emissions for each secondary aluminum processing unit (SAPU)

40 CFR 63.1511
This section states the general requirements for performance tests and compliance demonstrations.

40 CFR 63.1512
This section states the requirements and procedures for conducting performance tests and compliance demonstrations.

40 CFR 63.1513
This citation states the equations for determining compliance with Subpart RRR.

40 CFR 63.1514
This citation states the requirements for a change of the furnace classification.

40 CFR 63.1515 (b)
This condition requires the owner/operator to submit a compliance status report to the Department. It outlines all the information to be submitted in the report to show compliance.

40 CFR 63.1516
Conditions under this section of the Secondary Aluminum MACT outline the reports required from subject facilities.

40 CFR 63.1517
Conditions under this section of the secondary aluminum MACT outline the records that must be kept by subject facilities.

40 CFR 63.1518
This section states that Appendix A of 40CFR 63 Subpart RRR contains portions of the general provisions (40CFR 63 Subpart A) that are also applicable.

40 CFR Part 63, Subpart DDDDD
This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

6 NYCRR 201-6.4 (f)
This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 202-2.4 (a) (3)
Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.6 (a)
This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.4 (a)
Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department prior to July 1, 1973 are restricted to 0.15 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-2.4 (b)
Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1 (a) (2)
This provision states that owners and/or operators of facilities located outside of the the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury or New York City metropolitan area with an annual potential to emit of 100 tons or more of NOx or 50 tons or more of VOCs must comply with the requirements of this section.

6 NYCRR 227-2.4 (d)
This section includes NOx RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

6 NYCRR 227-2.4 (g)
This subdivision establishes NOx RACT for emission sources that are subject to this rule but not specifically regulated under the other source categories of this rule.

6 NYCRR 231-11.2

This section contains the reasonable possibility requirements for insignificant modifications for this Part.

6 NYCRR 231-11.2 (c)
This citation lists the record keeping requirements for insignificant modifications that are greater than 50% of the threshold including excluded emissions as defined in 231-4.1(b)(40)(i)(c) of this Part.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6 NYCRR Subpart 225-2
This Subpart regulates the firing of waste oil.

Compliance Certification
Summary of monitoring activities at NOVELIS CORPORATION:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
0-ANEAL	100	record keeping/maintenance procedures
0-ANEAL	101	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	intermittent emission testing
FACILITY	59	intermittent emission testing
FACILITY	60	intermittent emission testing
FACILITY	61	intermittent emission testing
FACILITY	62	intermittent emission testing
FACILITY	63	intermittent emission testing
FACILITY	64	intermittent emission testing
FACILITY	65	intermittent emission testing
FACILITY	66	intermittent emission testing
FACILITY	67	intermittent emission testing
FACILITY	68	intermittent emission testing
FACILITY	69	intermittent emission testing
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	73	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
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FACILITY	91	record keeping/maintenance procedures
FACILITY	92	record keeping/maintenance procedures
FACILITY	93	record keeping/maintenance procedures
FACILITY	94	record keeping/maintenance procedures
FACILITY	95	record keeping/maintenance procedures
FACILITY	20	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures

FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	intermittent emission testing
FACILITY	30	intermittent emission testing
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	intermittent emission testing
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	work practice involving specific operations
FACILITY	37	monitoring of process or control device parameters as surrogate
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	monitoring of process or control device parameters as surrogate
FACILITY	40	intermittent emission testing
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	intermittent emission testing
FACILITY	43	work practice involving specific operations
0-00RC1	98	monitoring of process or control device parameters as surrogate
0-00RC1/-/RC1	99	monitoring of process or control device parameters as surrogate
R-C2HOT	103	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	46	monitoring of process or control device parameters as surrogate
FACILITY	47	monitoring of process or control device parameters as surrogate
FACILITY	48	intermittent emission testing
FACILITY	49	intermittent emission testing
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	monitoring of process or control device parameters as surrogate
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
H-OTMIL	102	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures

Basis for Monitoring
The facility will be required to monitor emissions of PM, PM10, and PM2.5 for a five year period after operation of the new air pollution control system is installed, pursuant to 6 NYCRR 231-11.2.