

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
Audubon Metals Texas LLC

AUTHORIZING THE OPERATION OF
Audubon Metals Texas
Secondary Smelting

LOCATED AT
Navarro County, Texas
Latitude 32° 5' 51" Longitude 96° 23' 37"
Regulated Entity Number: RN110854973

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: Q4873 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts RRR or ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113,

Subchapter C, §§ 113.750 or 113.1090, respectively, which incorporates the 40 CFR Part 63 Subparts by reference.

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is

determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

C. For visible emissions from all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7); the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(8)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(8)(B)(i) or (ii)
- (iii) For a source subject to 30 TAC § 111.111(a)(8)(A), complying with 30 TAC § 111.111(a)(8)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a source which is required to comply with 30 TAC § 111.111(a)(8)(A) shall be conducted at least once during each calendar quarter unless the source is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of sources operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of sources operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each source in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each source during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer

visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(8) and (a)(8)(A)
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(8)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- D. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- E. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- F. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 5. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be

maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

Additional Monitoring Requirements

6. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "Periodic Monitoring Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

7. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated November 17, 2025 in the application for project 39496), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
8. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
9. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

10. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Risk Management Plan

12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

Permit Location

13. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

14. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary	12
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Applicable Requirements Summary	13
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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
10	MISCELLANEOUS UNITS	N/A	63RRR-01	40 CFR Part 63, Subpart RRR	No changing attributes.
3	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1111-01	30 TAC Chapter 111, Visible Emissions	No changing attributes.
3	MISCELLANEOUS UNITS	N/A	63RRR-01	40 CFR Part 63, Subpart RRR	No changing attributes.
6	MISCELLANEOUS UNITS	N/A	63RRR-01	40 CFR Part 63, Subpart RRR	No changing attributes.
9	MISCELLANEOUS UNITS	N/A	63RRR-01	40 CFR Part 63, Subpart RRR	No changing attributes.
GEN	SRIC ENGINES	N/A	63ZZZZ-01	40 CFR Part 63, Subpart ZZZZ	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
10	EU	63RRR-01	112(B) HAPS	40 CFR Part 63, Subpart RRR	§ 63.1505(i)(3) § 63.1505(a) § 63.1505(i)(7) § 63.1505(k)(3) § 63.1505(k)(5) § 63.1506(a)(5) § 63.1506(b)(1) § 63.1506(b)(2) § 63.1506(c) § 63.1506(c)(1) § 63.1506(c)(2) § 63.1506(c)(3) § 63.1506(d)(1) § 63.1506(d)(2) [G]§ 63.1506(m)(2) § 63.1506(m)(3) § 63.1506(m)(4) § 63.1506(m)(5) [G]§ 63.1506(m)(6) § 63.1506(m)(7) § 63.1506(p)	The owner or operator of a group 1 furnace must not discharge or cause to be discharged to the atmosphere in excess of 15 micrograms of D/F TEQ per Mg of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1510(c) § 63.1510(d)(1) § 63.1510(d)(2) § 63.1510(d)(2)(iii)(A) [G]§ 63.1510(e) [G]§ 63.1510(f)(2) [G]§ 63.1510(h) [G]§ 63.1510(i)(1) § 63.1510(i)(4) [G]§ 63.1510(j) [G]§ 63.1510(s) [G]§ 63.1510(t) § 63.1510(u) [G]§ 63.1510(w) § 63.1511(a) § 63.1511(b) § 63.1511(b)(1) § 63.1511(b)(2) [G]§ 63.1511(b)(3) § 63.1511(b)(4) § 63.1511(b)(5) § 63.1511(b)(7) § 63.1511(c)(1) § 63.1511(c)(2) § 63.1511(c)(3) § 63.1511(c)(4) § 63.1511(c)(7) [G]§ 63.1511(g) § 63.1511(h) § 63.1512(d)(1) [G]§ 63.1512(j)(2)	§ 63.1510(i)(2) § 63.1510(n)(1) [G]§ 63.1517(a) § 63.1517(b)(1)(ii) § 63.1517(b)(10) § 63.1517(b)(13) § 63.1517(b)(14) § 63.1517(b)(15) § 63.1517(b)(16) § 63.1517(b)(16)(ii) § 63.1517(b)(16)(iii) § 63.1517(b)(17) § 63.1517(b)(18) [G]§ 63.1517(b)(19) § 63.1517(b)(3) § 63.1517(b)(4)(i) § 63.1517(b)(4)(ii) § 63.1517(b)(5) § 63.1517(b)(6) § 63.1517(b)(7)	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) § 63.1510(b)(4)[G] § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1510(n)(2) § 63.1516(b)(1)(ii) § 63.1516(b)(1)(iv) § 63.1516(b)(1)(vi) § 63.1516(b)(1)(vii) § 63.1516(b)(2)(iii) § 63.1516(b)(2)(vii) [G]§ 63.1516(b)(3)(i) § 63.1516(b)(4) § 63.1516(d) § 63.1516(e)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							§ 63.1512(k) § 63.1512(l) [G]§ 63.1512(n) [G]§ 63.1512(o) § 63.1513(b)(2) § 63.1513(d) § 63.1513(e)(3) [G]§ 63.1513(f)		
3	EP	R1111-01	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None
3	EU	63RRR-01	112(B) HAPS	40 CFR Part 63, Subpart RRR	§ 60.1505(e)(1)(iii) § 63.1505(a) § 63.1506(a)(5) [G]§ 63.1506(b) § 63.1506(c) § 63.1506(c)(1) § 63.1506(c)(2) § 63.1506(c)(3) § 63.1506(d)(1) § 63.1506(d)(2) [G]§ 63.1506(g)(1) § 63.1506(g)(4) § 63.1506(g)(5) § 63.1506(p)	The owner or operator of a scrap dryer/delacquering kiln/decoating kiln must not discharge or cause to be discharged to the atmosphere emissions in excess of 5.0 micro grams of D/F TEQ per Mg of feed/charge from a scrap dryer/delacquering kiln/decoating kiln at a secondary aluminum production facility that is a major or area source.	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1510(c) § 63.1510(d)(1) § 63.1510(d)(2) § 63.1510(d)(2)(iii)(A) [G]§ 63.1510(e) [G]§ 63.1513(f)	[G]§ 63.1517(a) § 63.1517(b)(13) § 63.1517(b)(14) § 63.1517(b)(16) § 63.1517(b)(16)(ii) § 63.1517(b)(16)(iii) [G]§ 63.1517(b)(18) [G]§ 63.1517(b)(19) [G]§ 63.1517(b)(2) § 63.1517(b)(6) § 63.1517(b)(7)	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1516(b)(1)(iv) § 63.1516(b)(1)(vi) § 63.1516(b)(2)(vii) [G]§ 63.1516(b)(3)(i) § 63.1516(b)(4) § 63.1516(d) § 63.1516(e)
6	EU	63RRR-01	112(B) HAPS	40 CFR Part 63, Subpart RRR	§ 63.1505(i)(3) § 63.1505(a) § 63.1505(i)(7) § 63.1505(k)(3) § 63.1505(k)(5) § 63.1506(a)(5) § 63.1506(b)(1)	The owner or operator of a group 1 furnace must not discharge or cause to be discharged to the atmosphere in excess of 15 micrograms of D/F TEQ per Mg of feed/charge from a	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6)	§ 63.1510(i)(2) § 63.1510(n)(1) [G]§ 63.1517(a) § 63.1517(b)(1)(ii) § 63.1517(b)(10) § 63.1517(b)(13) § 63.1517(b)(14)	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.1506(b)(2) § 63.1506(c) § 63.1506(c)(1) § 63.1506(c)(2) § 63.1506(c)(3) § 63.1506(d)(1) § 63.1506(d)(2) [G]§ 63.1506(m)(2) § 63.1506(m)(3) § 63.1506(m)(4) § 63.1506(m)(5) [G]§ 63.1506(m)(6) § 63.1506(m)(7) § 63.1506(p)	group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.	§ 63.1510(b)(7) § 63.1510(c) § 63.1510(d)(1) § 63.1510(d)(2) § 63.1510(d)(2)(iii)(A) [G]§ 63.1510(e) [G]§ 63.1510(f)(2) [G]§ 63.1510(h) [G]§ 63.1510(i)(1) § 63.1510(i)(4) [G]§ 63.1510(j) [G]§ 63.1510(s) [G]§ 63.1510(t) § 63.1510(u) [G]§ 63.1510(w) § 63.1513(b)(2) § 63.1513(d) § 63.1513(e)(3) [G]§ 63.1513(f)	§ 63.1517(b)(16) § 63.1517(b)(16)(ii) § 63.1517(b)(16)(iii) § 63.1517(b)(17) [G]§ 63.1517(b)(18) [G]§ 63.1517(b)(19) § 63.1517(b)(3) § 63.1517(b)(4)(i) § 63.1517(b)(4)(ii) § 63.1517(b)(5) § 63.1517(b)(6) § 63.1517(b)(7)	§ 63.1510(b)(7) § 63.1510(n)(2) § 63.1516(b)(1)(ii) § 63.1516(b)(1)(iv) § 63.1516(b)(1)(vi) § 63.1516(b)(1)(vii) § 63.1516(b)(2)(iii) § 63.1516(b)(2)(vii) [G]§ 63.1516(b)(3)(i) § 63.1516(b)(4) § 63.1516(d) § 63.1516(e)
9	EU	63RRR-01	112(B) HAPS	40 CFR Part 63, Subpart RRR	§ 63.1505(i)(3) § 63.1505(a) § 63.1505(i)(7) § 63.1505(k)(3) § 63.1505(k)(5) § 63.1506(a)(5) § 63.1506(b)(1) § 63.1506(b)(2) § 63.1506(c) § 63.1506(c)(1) § 63.1506(c)(2) § 63.1506(c)(3) § 63.1506(d)(1) § 63.1506(d)(2) [G]§ 63.1506(m)(2) § 63.1506(m)(3) § 63.1506(m)(4) § 63.1506(m)(5) [G]§ 63.1506(m)(6)	The owner or operator of a group 1 furnace must not discharge or cause to be discharged to the atmosphere in excess of 15 micrograms of D/F TEQ per Mg of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1510(c) § 63.1510(d)(1) § 63.1510(d)(2) § 63.1510(d)(2)(iii)(A) [G]§ 63.1510(e) [G]§ 63.1510(f)(2) [G]§ 63.1510(h) [G]§ 63.1510(i)(1) § 63.1510(i)(4) [G]§ 63.1510(j)	§ 63.1510(i)(2) § 63.1510(n)(1) [G]§ 63.1517(a) § 63.1517(b)(1)(ii) § 63.1517(b)(10) § 63.1517(b)(13) § 63.1517(b)(14) § 63.1517(b)(15) § 63.1517(b)(16) § 63.1517(b)(16)(ii) § 63.1517(b)(16)(iii) § 63.1517(b)(17) § 63.1517(b)(18) [G]§ 63.1517(b)(19) § 63.1517(b)(3) § 63.1517(b)(4)(i) § 63.1517(b)(4)(ii) § 63.1517(b)(5) § 63.1517(b)(6)	§ 63.1510(b) § 63.1510(b)(1) § 63.1510(b)(2) § 63.1510(b)(3) [G]§ 63.1510(b)(4) § 63.1510(b)(5) § 63.1510(b)(6) § 63.1510(b)(7) § 63.1510(n)(2) § 63.1516(b)(1)(ii) § 63.1516(b)(1)(iv) § 63.1516(b)(1)(vi) § 63.1516(b)(1)(vii) § 63.1516(b)(2)(iii) [G]§ 63.1516(b)(3)(i) § 63.1516(b)(4) § 63.1516(d) § 63.1516(e)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.1506(m)(7) § 63.1506(p)		[G]§ 63.1510(s) [G]§ 63.1510(t) § 63.1510(u) [G]§ 63.1510(w) § 63.1511(a) § 63.1511(b) § 63.1511(b)(1) § 63.1511(b)(2) [G]§ 63.1511(b)(3) § 63.1511(b)(4) § 63.1511(b)(5) § 63.1511(b)(7) § 63.1511(c)(1) § 63.1511(c)(2) § 63.1511(c)(3) § 63.1511(c)(4) § 63.1511(c)(7) [G]§ 63.1511(g) § 63.1511(h) § 63.1512(d)(1) [G]§ 63.1512(j)(2) § 63.1512(k) § 63.1512(l) [G]§ 63.1512(n) [G]§ 63.1512(o) § 63.1513(b)(2) § 63.1513(d) § 63.1513(e)(3) [G]§ 63.1513(f)	§ 63.1517(b)(7)	
GEN	EU	63ZZZZ-01	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.4 § 63.6595(a)(1) § 63.6604(b) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(f) § 63.6625(h) § 63.6625(i)	For each existing emergency stationary CI RICE and black start stationary CI RICE, located at an area source, you must comply with the requirements as specified in Table 2d.4.a-c.	§ 63.6625(i) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6625(i) § 63.6655(e) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(a)-Table 7.4 § 63.6650(f) [G]§ 63.6650(h)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.6640(f)(1) § 63.6640(f)(2) § 63.6640(f)(2)(i) § 63.6640(f)(4) § 63.6640(f)(4)(i) [G]§ 63.6640(f)(4)(ii)				

Additional Monitoring Requirements

Periodic Monitoring Summary 19

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: 3	
Control Device ID No.: DRYER BH	Control Device Type: Fabric filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-01
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: N/A	
Deviation Limit: Opacity shall not exceed 15% averaged over a six-minute period	
Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying applicable requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.	

Permit Shield

Permit Shield 21

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
1	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
3	N/A	40 CFR Part 63, Subpart DDDDD	This facility is not a major source of HAPs as defined in 63.2.
4A	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
4B	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
4C	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
4D	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
4E	N/A	40 CFR Part 63, Subpart RRR	Not an affected source as listed in 63.1500(c)(1)-(4) for a secondary aluminum production facility that is located at an area source of HAPs.
GEN	N/A	40 CFR Part 60, Subpart IIII	Model of engine is before 2007.

New Source Review Authorization References

New Source Review Authorization References	23
New Source Review Authorization References by Emission Unit	24

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1652	Issuance Date: 05/22/2025
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 158434	Issuance Date: 05/22/2025
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.511	Version No./Date: 09/04/2000

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
1	RAW MATERIAL HANDLING - NON-FERROUS METAL SCRAP	158434, PSDTX1652
10	ROTARY FURNACE	158434, PSDTX1652
3	ROTARY THERMAL SCRAP DRYER	158434, PSDTX1652
4A	TWITCH HANDLING	158434, PSDTX1652
4B	SMELTER/CONVERTER SIDE WELL #1 (UNCAPTURED)	158434, PSDTX1652
4C	SMELTER/CONVERTER SIDE WELL #2 (UNCAPTURED)	158434, PSDTX1652
4D	ROTARY FURNACE (UNCAPTURED EMISSIONS)	158434, PSDTX1652
4E	LAUNDER AND INGOT MOLD HEATERS	158434, PSDTX1652
6	SMELTER/CONVERTER FURNACE SIDEWELL #1	158434, PSDTX1652
9	SMELTER/CONVERTER FURNACE SIDEWELL #2	158434, PSDTX1652
GEN	EMERGENCY GENERATOR	106.511/09/04/2000

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Appendix A

Acronym List 26

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
RO	Responsible Official
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table 28

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
1	Raw Material Handling (5)	PM	0.23	1.01	29	41	
		PM ₁₀	0.11	0.48			
		PM _{2.5}	0.02	0.07			
2	Ring Crusher Baghouse Stack	PM	0.26	1.13	27, 30	41	
		PM ₁₀	0.26	1.13			
		PM _{2.5}	0.13	0.56			
3	Rotary Thermal Scrap Dryer Baghouse Stack (6)	PM	1.77	7.76	27, 30, 31	41	
		PM ₁₀	1.58	6.90			
		PM _{2.5}	1.37	5.98			
		CO	0.53	2.34			
		SO ₂	0.01	0.06			
		NO _x	2.31	10.13			
		VOC	0.85	3.74			
		D/F	<0.01	<0.01			
		Benzene	0.01	0.06			
		HAP	0.52	2.28			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
4A	Twitch Handling (5)	PM	0.38	1.68	29	41	
		PM ₁₀	0.18	0.79			
		PM _{2.5}	0.03	0.12			
4B	Smelter/Converter Side Well #1 (Uncaptured Emissions) (5)	PM	0.05	0.14	29	41	
		PM ₁₀	0.03	0.08			
		PM _{2.5}	0.02	0.05			
		CO	0.01	0.03			
		VOC	<0.01	0.01			
		HF	<0.01	<0.01			
		HCl	0.02	0.06			
		D/F	<0.01	<0.01			
		Benzene	<0.01	<0.01			
		HAP	0.02	0.07			
4C	Smelter/Converter Side Well #2 (Uncaptured Emissions) (5)	PM	0.05	0.14	29	41	
		PM ₁₀	0.03	0.08			
		PM _{2.5}	0.02	0.05			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		CO	<0.01	0.03			
		VOC	<0.01	0.01			
		HF	<0.01	<0.01			
		HCl	0.02	0.06			
		D/F	<0.01	<0.01			
		Benzene	<0.01	<0.01			
		HAP	0.02	0.06			
4D	Rotary Furnace (Uncaptured Emissions) (5)	PM	0.03	0.09	29	41	
		PM ₁₀	0.01	0.05			
		PM _{2.5}	0.01	0.04			
		CO	0.08	0.26			
		SO ₂	<0.01	<0.01			
		NO _x	<0.01	0.02			
		VOC	<0.01	0.02			
		HCl	0.07	0.23			
		D/F	<0.01	<0.01			
		Benzene	<0.01	<0.01			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		HAP	0.07	0.23			
4E	Launder and Ingot Mold Heaters (5)	PM	0.03	0.11	29	41	
		PM ₁₀	0.03	0.11			
		PM _{2.5}	0.03	0.11			
		CO	0.29	1.26			
		SO ₂	<0.01	0.01			
		NO _x	0.34	1.50			
		VOC	0.02	0.08			
		Benzene	<0.01	<0.01			
		HAP	<0.01	0.03			
5	Smelter/Converter #1 Furnace Hearth Stack	PM	0.22	0.98		41	
		PM ₁₀	0.22	0.98			
		PM _{2.5}	0.22	0.98			
		CO	2.47	10.82			
		SO ₂	0.02	0.08			
		NO _x	2.65	11.61			
		VOC	0.16	0.71			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		HAP	0.07	0.29			
6	Smelter/Converter #1 Furnace Sidewell Baghouse Stack (6)	PM	2.35	6.59	28, 30, 31	41	
		PM ₁₀	1.93	5.40			
		PM _{2.5}	1.72	4.83			
		CO	9.89	27.73			
		VOC	3.23	9.06			
		HF	0.09	0.24			
		HCl	0.64	1.80			
		D/F	<0.01	<0.01			
		Benzene	1.39	3.88			
		HAP	3.07	8.61			
7	Diesel Storage Tank	VOC	0.17	<0.01		41	
8	Smelter/Converter #2 Furnace Hearth Stack	PM	0.22	0.98		41	
		PM ₁₀	0.22	0.98			
		PM _{2.5}	0.22	0.98			
		CO	2.47	10.82			
		SO ₂	0.02	0.08			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
9	Smelter/Converter #2 Sidewell Baghouse Stack (6)	NO _x	2.65	11.61	28, 30, 31	41	
		VOC	0.16	0.71			
		HAP	0.07	0.29			
		PM	2.35	6.59			
		PM ₁₀	1.93	5.40			
		PM _{2.5}	1.72	4.83			
		CO	9.89	27.73			
		VOC	3.23	9.06			
		HF	0.08	0.24			
		HCl	0.64	1.80			
10	Rotary Furnace (6)	D/F	<0.01	<0.01	28, 30, 31	41	
		Benzene	0.36	1.00			
		HAP	1.46	4.09			
		PM	0.61	2.02			
		PM ₁₀	0.45	1.51			
		PM _{2.5}	0.44	1.47	28, 30, 31	41	
		CO	26.29	87.63			

Permit Number 158434 and PSDTX1652					Issuance Date: 05/22/2025		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		SO ₂	0.01	0.05			
		NO _x	1.76	7.71			
		VOC	2.19	7.31			
		HCl	0.68	2.26			
		D/F	<0.01	<0.01			
		Benzene	0.26	1.14			
		HAP	1.04	3.87			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code (TAC) § 101.1
NO_x - total oxides of nitrogen
SO₂ - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
HF - hydrogen fluoride
HCl - hydrogen chloride
D/F - dioxins/furans
HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup and shutdown emissions are included. Maintenance activities, except as specified in Special Condition Nos. 23 through 24, are not authorized by this permit and will need separate authorization, unless the activity can meet the conditions of 30 TAC § 116.119.



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Audubon Metals Texas LLC
Authorizing the Construction and Operation of
Secondary Aluminum Production Facility
Located at Corsicana, Navarro County, Texas
Latitude 32.0975 Longitude -96.393611

Permits: 158434 and PSDTX1652

Amendment Date: May 22, 2025

Expiration Date: March 20, 2030



For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)] ¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)] ¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit. ¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLCmax = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m ³ = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO _x = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 158434 and PSDTX1652

Emission Limitations

1. This permit authorizes only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit.

Fuel Specifications

2. Fuel for the Rotary Thermal Scrap Dryer, Thermal Oxidizer, Smelter/Converter Furnace, and Launder and Ingot Mold Heaters shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
3. Upon request by the Executive Director of the TCEQ or the TCEQ Regional Director or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuels used in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in Title 40 Code of Federal Regulations (40 CFR) Part 63, specifically the following:
 - A. Subpart A - General Provisions; and
 - B. Subpart RRR - Secondary Aluminum Production.

Opacity/Visible Emission Limitations

5. Opacity of particulate matter emissions from the Ring Crusher Baghouse Stack (Emission Point No. [EPN] 2), Rotary Thermal Scrap Dryer Baghouse Stack (EPN 3), the Smelter/Converter Furnace Sidewell Baghouse Stacks (EPNs 6 and 9), and the Rotary Furnace Baghouse Stack (EPN 10) shall not exceed 5 percent, averaged over a six-minute period. **(05/25)**
6. Visible fugitive emissions from raw material handling and the Melt Department Building shall not leave the property for more than 30 cumulative seconds in any six-minute period.

Operational Limitations, Work Practices, and Plant Design

7. The facility shall be limited to the following hourly and annual throughput rates:

Table 1: Hourly and Annual Throughput Limits

Source	Tons per hour	Tons per year in any rolling 12-month period
Raw Material Handling	54.1	-

Source	Tons per hour	Tons per year in any rolling 12-month period
Rotary Thermal Scrap Dryer	40	-
Twitch Handling	40	-
Smelter/Converter Furnaces #1	9.81	55,000
Smelter/Converter Furnaces #2	9.81	55,000
Rotary Furnace	6.75	59.130

8. The facilities are authorized to operate up to 8,760 hours per year.
9. Fabric filter dust collectors shall be designed to meet the maximum total filterable PM outlet grain loading values listed in the table below, in units of grain per dry standard cubic foot (gr/dscf) of exhaust. The dust collectors shall be properly installed and in good working order and shall control particulate matter emissions, when this equipment is in operation, from the following sources:

Table 2: Fabric Filter Dust Collector Maximum Outlet Grain Loading Values

EPN	Source Name	Outlet Grain Loading (gr/dscf)
2	Ring Crusher	0.001
3	Rotary Thermal Scrap Dryer	0.003
6	Smelter/Converter Furnace #1 Sidewell	0.004
9	Smelter/Converter Furnace #2 Sidewell	0.01
10	Rotary Furnace	0.01

10. Slaked lime shall be injected into the duct works leading to the Rotary Thermal Scrap Dryer Baghouse (after the afterburner) and the Smelter/Converter Furnace Sidewell Baghouse. Lime handling shall be accomplished in a manner that minimizes fugitive emissions.
11. Area suppression (e.g. Dust Boss units) and/or permanently mounted spray bars shall be installed at all raw material handling transfer points (EPN 1) prior to the wet media system, excluding twitch transfer points. All area suppression and water spray systems shall be operated as necessary to maintain compliance with applicable TCEQ rules and regulations.
12. A thermal afterburner (oxidizer), properly installed and in good working order, shall control emissions from the Rotary Thermal Scrap Dryer when this equipment is in operation. The thermal afterburner shall be equipped with a temperature gauge. The operating temperature of the afterburner shall be maintained at or above the average temperature established during the performance test and monitored and recorded according to 40 CFR Part 63, Subpart RRR.
13. Twitch handling operations shall occur within the melt department building.
14. Salt and chlorine flux material shall be added to the furnace only through the sidewell.

15. Daily records of fluxing material used, including chlorine, shall be maintained and made available to the TCEQ upon request.
16. Except for labels, logos, etc. not to exceed 15 percent of the tank total surface area, uninsulated tank exterior surfaces exposed to the sun of the diesel storage tank (EPN 7) shall be white or unpainted aluminum. The storage tank shall be equipped with a permanent submerged fill pipe.
17. All hooding, duct, and collection systems shall be effective in capturing emissions from the intended equipment and in minimizing fugitive emissions from the building. The hooding and duct systems shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the emission capture system.
18. Good housekeeping shall be observed throughout the facility to minimize fugitive emissions. All spills of material shall be cleaned up as soon as practicable to prevent material from becoming airborne.
19. All in-plant roads and traffic areas shall be paved with a cohesive hard surface that can be cleaned by sweeping or watered daily, as necessary, to achieve maximum control of dust emissions and to maintain compliance with all applicable TCEQ rules and regulations.
20. Baghouse dust shall be collected in enclosed or covered containers. Disposal of particulate matter (PM) that is captured in the fabric baghouses must be accomplished in a manner that will minimize fugitive emissions. There shall be no outside storage of baghouse dust unless in sealed containers.
21. Used baghouse bags shall be stored in sealed containers. Disposal of used bags shall be accomplished in such a manner that will minimize fugitive emissions.
22. The holder of this permit shall physically identify and mark in a conspicuous location all equipment that has the potential of emitting air contaminants with the emission point numbers as listed on the Maximum Allowable Emission Rates Table (MAERT).

Planned Maintenance, Startup, and Shutdown (MSS)

23. The holder of this permit shall minimize emissions during planned MSS activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility.
24. The planned maintenance activities of refractory removal and replacement for the Scrap Dryer and Smelter/Converter Furnace are authorized. The associated air pollution control equipment for particulate matter (baghouses) shall be operated during all planned maintenance activities authorized by this permit.

Initial Determination of Compliance

25. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Smelter/Converter Furnace Sidewell #2 Baghouse Stack (EPN 9) and the

Rotary Furnace Baghouse Stack (EPN 10). Air contaminants to be tested for include (but are not limited to) PM, PM₁₀, PM_{2.5}, VOC, CO, hydrogen fluoride (HF), hydrogen chloride (HCl), and dioxan/furan (D/F). Sampling shall be accomplished within 60 days of achieving maximum production but not later than 180 days after startup. Sampling must be conducted in accordance with the TCEQ *Guidelines for Stack Sampling Facilities* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(05/25)**

Demonstration of Continuous Compliance

26. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ *Guidelines for Stack Sampling Facilities* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.
27. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for the Ring Crusher Baghouse Stack (EPN 2) and the Rotary Thermal Scrap Dryer Baghouse Stack (EPN 3). This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:
 - A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Recordkeeping Requirements; or
 - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Recordkeeping Requirements.
28. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for the Smelter/Converter Furnace Sidewell #1 and #2 Baghouse Stacks (EPNs 6 and 9) and Rotary Furnace Baghouse Stack (EPN 10), unless a continuous opacity monitor is installed, calibrated, maintained, and operated to record opacity according to 40 CFR Part 63, Subpart RRR. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall: **(05/25)**

- A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Recordkeeping Requirements; or
 - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Recordkeeping Requirements.
29. The holder of this permit shall conduct a quarterly visible fugitive emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit. This visible fugitive emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible fugitive emissions leaving the property exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible fugitive emissions. The corrective action shall be documented within 24 business hours of completion.
30. The holder of this permit shall install, calibrate, and maintain a device to monitor and record pressure drop in the Ring Crusher Baghouse (EPN 2), Rotary Thermal Scrap Dryer Baghouse (EPN 3), the Smelter/Converter Furnace Sidewell #1 and #2 Baghouses (EPNs 6 and 9), and the Rotary Furnace Baghouse Stack (EPN 10). The monitoring devices shall be calibrated in accordance with the manufacturer's specifications and shall be calibrated at least annually and shall be accurate to within a range of ± 0.5 inches water gauge pressure (± 125 pascals); or $\pm 0.5\%$ of span. **(05/25)**
- A minimum and maximum pressure drop shall be maintained in accordance with the manufacturer's specifications. The actual pressure drop shall be recorded at least once per day.
31. For each lime injection system, free-flowing lime in the hopper to the feed device shall be maintained at all times the associated emissions generating equipment is operating and the lime feeder setting shall be maintained at or above the level established during the performance test. The slaked lime injection rate shall be monitored and recorded according to 40 CFR Part 63, Subpart RRR.

Sampling Requirements

32. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Guidelines for Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.
33. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:

- A. Date for pretest meeting;
- B. Date sampling will occur;
- C. Points or sources to be sampled;
- D. Name of firm conducting sampling;
- E. Type of sampling equipment to be used; and
- F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

- 34. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.
- 35. Requests to waive testing for any pollutant specified shall be submitted, in writing, for approval to the TCEQ Office of Air, Air Permits Division in Austin.
- 36. During stack sampling emission testing, the facilities shall operate at maximum represented throughput rates. Primary operating parameters that enable determination of throughput rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.

If the plant is unable to operate at the maximum represented throughput rates during testing, then additional stack testing shall be required when the throughput rate exceeds the previous stack test throughput rate by +10 percent unless otherwise determined, in writing, by the TCEQ Executive Director.

- 37. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office with jurisdiction. Additional time to comply with the applicable federal requirements requires EPA approval, and requests shall be submitted to the TCEQ Regional Office with jurisdiction.
- 38. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

One copy to each appropriate local air pollution control program with jurisdiction.

- 39. If, as a result of stack sampling, compliance with the permitted emission rates cannot be demonstrated, the holder of this permit shall adjust any operating parameters so as to comply with Special Condition No. 1 and the permitted emission rates.

40. If the holder of this permit is required to adjust any operating parameters for compliance, then beginning no later than 60 days after the date of the test conducted, the holder of this permit shall submit to the TCEQ, on a monthly basis, a record of adjusted operating parameters and daily records of throughput sufficient to demonstrate compliance with the permitted emission rates. Daily records of throughput and operating parameters shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

Recordkeeping Requirements

41. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be retained for a rolling 24-month period and include the following:
- A. Hourly throughputs (in tons) totaled for each calendar month;
 - B. Annual throughputs (in tons);
 - C. Quarterly observations for visible emissions and/or opacity determinations from the Ring Crusher Baghouse Stack (EPN 2) and the Rotary Thermal Scrap Dryer Baghouse Stack (EPN 3);
 - D. Quarterly observations for visible emissions and/or opacity determinations from the Smelter/Converter Furnace Sidewall Baghouse #1 and #2 Stacks (EPNs 6 and 9) and Rotary Furnace Baghouse Stack (EPN 10) if a continuous opacity monitor is not used to record opacity; **(05/25)**
 - E. Quarterly observations for visible fugitive emissions from raw material handling and the Melt Department Building;
 - F. Daily baghouse pressure drop readings;
 - G. COMS data (for EPNs 6, 9, and 10 only) if a continuous opacity monitor is used to record opacity; **(05/25)**
 - H. Temperature measurements (in degrees Fahrenheit) for the thermal afterburner to demonstrate compliance with minimum incineration temperature requirements;
 - I. Slaked lime injection rate for each lime injection system;
 - J. Daily records of the type and amount of fluxing material used;
 - K. Records of refractory removal and replacement for the Scrap Dryer and Smelter/Converter Furnace;
 - L. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance schedule; and
 - M. Records of materials (that have the potential to emit Hazardous Air Pollutants [HAPs]) used shall be kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months. The required records

shall be kept with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.

Date: May 22, 2025

Emission Sources - Maximum Allowable Emission Rates

Permit Number 158434 and PSDTX1652

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
1	Raw Material Handling (5)	PM	0.23	1.01
		PM ₁₀	0.11	0.48
		PM _{2.5}	0.02	0.07
2	Ring Crusher Baghouse Stack	PM	0.26	1.13
		PM ₁₀	0.26	1.13
		PM _{2.5}	0.13	0.56
3	Rotary Thermal Scrap Dryer Baghouse Stack	PM	1.77	7.76
		PM ₁₀	1.58	6.90
		PM _{2.5}	1.37	5.98
		CO	0.53	2.34
		SO ₂	0.01	0.06
		NO _x	2.31	10.13
		VOC	0.85	3.74
		D/F	<0.01	<0.01
		Benzene	0.01	0.06
		HAP	0.52	2.28
4A	Twitch Handling (5)	PM	0.38	1.68
		PM ₁₀	0.18	0.79
		PM _{2.5}	0.03	0.12
4B	Smelter/Converter Side Well #1 (Uncaptured Emissions) (5)	PM	0.05	0.14
		PM ₁₀	0.03	0.08
		PM _{2.5}	0.02	0.05
		CO	0.01	0.03
		VOC	<0.01	0.01
		HF	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		HCl	0.02	0.06
		D/F	<0.01	<0.01
		Benzene	<0.01	<0.01
		HAP	0.02	0.07
4C	Smelter/Converter Side Well #2 (Uncaptured Emissions) (5)	PM	0.05	0.14
		PM ₁₀	0.03	0.08
		PM _{2.5}	0.02	0.05
		CO	<0.01	0.03
		VOC	<0.01	0.01
		HF	<0.01	<0.01
		HCl	0.02	0.06
		D/F	<0.01	<0.01
		Benzene	<0.01	<0.01
		HAP	0.02	0.06
4D	Rotary Furnace (Uncaptured Emissions) (5)	PM	0.03	0.09
		PM ₁₀	0.01	0.05
		PM _{2.5}	0.01	0.04
		CO	0.08	0.26
		SO ₂	<0.01	<0.01
		NO _x	<0.01	0.02
		VOC	<0.01	0.02
		HCl	0.07	0.23
		D/F	<0.01	<0.01
		Benzene	<0.01	<0.01
		HAP	0.07	0.23
4E	Launder and Ingot Mold Heaters (5)	PM	0.03	0.11
		PM ₁₀	0.03	0.11

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		PM _{2.5}	0.03	0.11
		CO	0.29	1.26
		SO ₂	<0.01	0.01
		NO _x	0.34	1.50
		VOC	0.02	0.08
		Benzene	<0.01	<0.01
		HAP	<0.01	0.03
5	Smelter/Converter #1 Furnace Hearth Stack	PM	0.22	0.98
		PM ₁₀	0.22	0.98
		PM _{2.5}	0.22	0.98
		CO	2.47	10.82
		SO ₂	0.02	0.08
		NO _x	2.65	11.61
		VOC	0.16	0.71
		HAP	0.07	0.29
6	Smelter/Converter #1 Furnace Sidewell Baghouse Stack	PM	2.35	6.59
		PM ₁₀	1.93	5.40
		PM _{2.5}	1.72	4.83
		CO	9.89	27.73
		VOC	3.23	9.06
		HF	0.09	0.24
		HCl	0.64	1.80
		D/F	<0.01	<0.01
		Benzene	1.39	3.88
		HAP	3.07	8.61
7	Diesel Storage Tank	VOC	0.17	<0.01
8		PM	0.22	0.98

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
	Smelter/Converter #2 Furnace Hearth Stack	PM ₁₀	0.22	0.98
		PM _{2.5}	0.22	0.98
		CO	2.47	10.82
		SO ₂	0.02	0.08
		NO _x	2.65	11.61
		VOC	0.16	0.71
		HAP	0.07	0.29
9	Smelter/Converter #2 Sidewell Baghouse Stack	PM	2.35	6.59
		PM ₁₀	1.93	5.40
		PM _{2.5}	1.72	4.83
		CO	9.89	27.73
		VOC	3.23	9.06
		HF	0.08	0.24
		HCl	0.64	1.80
		D/F	<0.01	<0.01
		Benzene	0.36	1.00
		HAP	1.46	4.09
10	Rotary Furnace	PM	0.61	2.02
		PM ₁₀	0.45	1.51
		PM _{2.5}	0.44	1.47
		CO	26.29	87.63
		SO ₂	0.01	0.05
		NO _x	1.76	7.71
		VOC	2.19	7.31
		HCl	0.68	2.26
		D/F	<0.01	<0.01
		Benzene	0.26	1.14

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		HAP	1.04	3.87

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code (TAC) § 101.1
NO_x - total oxides of nitrogen
SO₂ - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
HF - hydrogen fluoride
HCl - hydrogen chloride
D/F - dioxins/furans
HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup and shutdown emissions are included. Maintenance activities, except as specified in Special Condition Nos. 23 through 24, are not authorized by this permit and will need separate authorization, unless the activity can meet the conditions of 30 TAC § 116.119.

Date: May 22, 2025