

Date (certified mail)

Mr. Mike Rousseau  
Alcoa Intalco Works  
4050 Mountain View Road  
Ferndale, WA 98248-0937

Dear Mr. Rousseau:

**Regional Haze Best Available Retrofit Technology (BART) Technical Analysis  
Order No. \_\_\_\_\_**

Best Available Retrofit Technology (BART) is required to reduce the regional haze impacts of emissions of your facility. The enclosed order #xxxx contains our BART determination for your facility including a schedule for compliance.

If you have questions or requests relating to this order, please contact Alan Newman at (360) 407-6810 or by mail at the address above.

Sincerely,

Jeff Johnston, Ph.D.  
Manager, Science and Engineering Section  
Air Quality Program

jj/te

Enclosure

cc: Robert Burmark, Ecology  
James Jones, EHS Services North America  
Alan Newman, Ecology  
Judy Schweiters, Industrial Section

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ]  
ADMINISTRATIVE ORDER AGAINST: ]  
Alcoa Intalco Works ]  
\_\_\_\_\_ ]

PROPOSED ORDER NO. \_\_\_\_\_

TO: Mr. Mike Rousseau  
Alcoa Intalco Works  
4050 Mountain View Road  
Ferndale, WA 98248-0937

This is an Administrative Order requiring your company to comply with WAC 173-400-151 by taking the actions that are described below. Chapter 70.94 RCW authorizes the Washington State Department of Ecology's Air Quality Program (Ecology) to issue Administrative Orders to require compliance with the requirements of Chapter 70.94 RCW and regulations issued to implement it.

Ecology has determined that portions of your facility are subject to the provisions of the federal and state visibility protection program (WAC 173-400-151 and 40 CFR Part 51, Subpart P). The rules require that the State determine what technologies and level of emission control constitutes Best Available Retrofit Technology (BART) for the eligible emission units at your facility.

**FINDINGS**

- A. The Alcoa Intalco Works (Intalco) is a primary aluminum smelter facility subject to BART.
- B. The BART-eligible emission units at Intalco are the three potlines, anode bake furnace, 13 aluminum holding furnaces, material handling and transfer operations, and a number of small miscellaneous units.
- C. Emissions from existing BART units are controlled by:
  - a. Use of six existing primary control systems each consisting of a dry alumina injection system followed by a baghouse for the primary control of PM and fluoride emissions from the potline buildings.
  - b. Use of a series of 159 wet roof scrubbers to control secondary PM and fluoride emissions from the potline buildings.

- c. Use of a dry alumina injection system followed by a baghouse for control of PM and fluoride emissions from the Anode Bake Furnace.
  - d. Use of sulfur content limitations to limit SO<sub>2</sub> emissions due to the manufacture and consumption of anodes.
  - e. Use of baghouses and fabric filters to control PM emissions from various Material Handling and Transfer Operations throughout the facility.
- D. Ecology has determined that the emission controls currently installed at Intalco meet the requirements of BART.
- E. Ecology has determined that Intalco has met the requirements of Administrative Order No. #5070 which required submittal of a BART Technical Analysis for the Intalco facility.

Additional information and analysis is available in the BART Determination Support Document for Alcoa Intalco Works, Ferndale, Washington, by the Washington State Department of Ecology, and the BART Determination for Alcoa Intalco Works Ferndale, Washington, prepared by ENVIRON Corporation on behalf of Alcoa Intalco Works, November 2007.

**YOU ARE ORDERED:** To operate existing emission control equipment in accordance with the following conditions:

1. BART Emission Limitations
  - 1.1. Meet the emission limitations for particulate matter, nitrogen oxides, and sulfur dioxide found in Order No. 02AQIS-3967 issued to Alcoa Intalco Works Aluminum Corporation on April 15, 2004 by the Washington State Department of Ecology's Industrial Section.
  - 1.2. Compliance will be determined as specified in Order No. 02AQIS-3967.
2. Schedule for Compliance
  - 2.1. Compliance with the emission limitations for particulate matter, nitrogen oxides, and sulfur dioxide is required upon the effective date of this Order.
3. Monitoring and Recordkeeping Requirements
  - 3.1. Monitoring and recordkeeping requirements for particulate matter, nitrogen oxides, and sulfur dioxide are contained in Order No. 02AQIS-3967 issued to Alcoa Intalco Works

Aluminum Corporation on April 15, 2004 by the Washington State Department of Ecology's Industrial Section.

#### 4. Reporting Requirements

- 4.1. Reporting requirements for particulate matter, nitrogen oxides, and sulfur dioxide are contained in Order No. 02AQIS-3967 issued to Alcoa Intalco Works Aluminum Corporation on April 15, 2004 by the Washington State Department of Ecology's Industrial Section.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

You have a right to appeal this Order. To appeal you must:

- File your appeal with the Pollution Control Hearing Board within 30 days of the "date of receipt" of this document. Filing means actual receipt by the Board during regular office hours.
- Serve your appeal on the Department of Ecology within 30 days of the "date of receipt" of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). "Date of receipt" is defined at RCW 43.21B.001(2).

If you appeal, you must:

- Include a copy of this document with your Notice of Appeal.
- Serve and file your appeal in paper form; electronic copies are not accepted.

To file your appeal with the Pollution Control Hearing Board:

Mail appeal to:

The Pollution Control Hearings Board  
P.O. Box 40903  
Olympia, WA 98504-0903

Deliver your appeal in person to:

OR  
The Pollution Control Hearings Board  
4224-6th Avenue SE Rowe Six, Bldg 2  
Lacey, WA 98503

Alcoa Intalco Works  
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Date of issuance

To serve your appeal on the Department of Ecology:

Mail appeal to:

Department of Ecology  
Appeals Coordinator  
P.O. Box 47608  
Olympia, WA 98504-7608

Deliver your appeal in person to:

OR Department of Ecology  
Appeals Coordinator  
300 Desmond Drive SE  
Lacey, WA 98503

And send a copy of your appeal packet to:

Alan Newman  
Department of Ecology  
Air Quality Program  
P. O. Box 47600  
Olympia, WA 98504-7600

For additional information, go to the Environmental Hearings Office website at <http://www.eho.wa.gov>.

To find laws and agency rules, go to the Washington State Legislator website at <http://www1.leg.wa.gov/CodeReviser>.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with Chapter 43.21B RCW.

DATED this \_\_\_ day of \_\_\_\_\_, 200\_\_ at Olympia, Washington.

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Jeff Johnston, Ph.D.  
Manager, Science and Engineering Section  
Department of Ecology  
Air Quality Program