



**Energy and Environment Cabinet**  
**Department for Environmental Protection**

Division for Air Quality  
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February 3, 2015

Mr. Stephen D. Page  
U.S. Environmental Protection Agency  
Ariel Rios Building  
EPA Docket Center (EPA/DC), Mailcode 28221T  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OAR-2011-0797

Re: 79 FR 72914, National Emissions Standards for Hazardous Air Pollutants:  
Primary Aluminum Reduction Plants (Supplemental proposed rulemaking.)

Dear Director Page:

On behalf of the Commonwealth of Kentucky, the Division for Air Quality (Division) respectfully submits the following comments, pursuant to the request for public comment published in the *Federal Register* on December 8, 2014 (79 FR 72914) regarding EPA's supplements to the proposed amendments to the national emission standards for hazardous air pollutants (NESHAP) for the Primary Aluminum Production source category.

First, with regard to measuring and recording emission rates of total fluorides (TF), polycyclic organic matter (POM), and particulate matter (PM) from roof vents, decreasing the frequency to three times each semiannual period would not provide a practical means of demonstrating continuous compliance with the emission standards of 40 CFR 63, Subpart LL. A reduced testing frequency may allow unidentified problems to persist for significant periods of time before discovery and result in substantial exceedances of the standards.

Within the past 4 years in Kentucky, exceedances of 40 CFR 63, Subpart LL standards revealed at the current testing frequency resulted in identification and quick correction of substantial issues causing the excess emissions. The issues included sick pots, fan failures, storage routines, shielding practices and maintenance, material purity, furnace temperature variation, broken dust collector bags, pitch buildup, and others. The

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current requirement of three test runs per month provides more sufficient continuous compliance assurance than the proposal affords.

Second, the Division requests that through the process of updating the testing frequency for roof vents that the U.S. EPA further define the “increase in the amount of total fluoride emitted into the atmosphere” currently used in the definition of “*Modified potroom group*” located in 40 CFR 63.842. Specifically, the definition should include a defined averaging period, increase in lb/ton limit, or defined testing that must be completed.

Lastly, the Division requests that the delineation between subcategories be distinctly established in regard to 40 CFR 63.843(6), *Change in subcategory*. Specifically, a definition of “very high purity aluminum” would be helpful when any facility, previously subject to the limits of a CWPB3 potline, changes processes, feed materials, or customer base such that the facility no longer produces “very high purity aluminum.” This definition is necessary for the permitting agency to appropriately classify sources and establish the appropriate emission limitations.

Thank you for this opportunity to comment on the supplemental proposed rulemaking. If you have any questions or concerns regarding these comments, please contact me at 502-564-3999.

Sincerely,



Sean O. Alteri  
Director

SOA/lj