



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

Division for Air Quality  
200 Fair Oaks Lane, 1<sup>st</sup> Floor  
Frankfort, Kentucky 40601-1403  
Web site: [air.ky.gov](http://air.ky.gov)

February 3, 2015

Mr. Stephen D. Page, Director  
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-2010-0544

Re: 79 FR 72874, National Emissions Standards for Hazardous Air Pollutants:  
Secondary Aluminum Production (Supplemental notice of 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 72874) for EPA's supplement to the proposed amendments to the national emission standards for hazardous air pollutants (NESHAP) for Secondary Aluminum Production source category.

First, with regard to the definition of *Shutdown*, the Division requests a clarification with how the definition relates to rotary tilt-type reverberatory furnaces, which operate on a batch-cycle. As proposed, the definition would classify the period between batches of this type of furnace, however brief and regularly scheduled, as a shutdown. Since this has implications with regard to secondary aluminum processing units (SAPUs), and how emissions from members of a SAPU are counted, clarification as to whether the time between batches is a shutdown is appropriate.

Second, in the proposed definition of *Startup*, the description states that a startup "begins with equipment warming up from a cold start or a complete shutdown." There is no explanation for what constitutes a "complete" shutdown as opposed to the proposed definition of "shutdown" or how it differs from a "cold start." The Division requests a clarification to forestall interpretation issues.

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Thank you for this opportunity to comment on the supplemental notice of 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