



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Wayne Wallace  
Executive Vice President  
Owl's Head Alloys, Incorporated  
187 Mitch McConnell Way  
Bowling Green, Kentucky 42101

07/11/2023

Dear Mr. Wallace:

I am writing in response to your request for the use of an alternative test method at Owl's Head Alloys, Incorporated, located at 187 Mitch McConnell Way, Bowling Green, Kentucky. Your original letter, dated March 23, 2023, was sent to EPA Region IV. Additional information was provided on May 1, 2023 and June 19, 2023. Your letter requests to use an alternative test method on an aluminum scrap shredder known as Emission Unit 09 (EU09). According to your letter, EU09 is subject to the particulate matter (PM) emission limits and testing requirements of 40 CFR part 63, Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production (Subpart RRR). The Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and procedures required under 40 CFR parts 59, 60, 61, 63, and 65. Your proposed alternative test method and our approval decisions are discussed below.

It is our understanding that EU09 is subject to the PM emission standard of 0.023 grams of PM per dry standard cubic meter (0.010 grains of PM per dry standard cubic foot) found in §63.1505(b)(1). Additionally, EU09 is permitted as a continuous process and is, therefore, subject to §63.1511(b)(2), which states:

*"Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours."*

Additionally, Kentucky Air Permit Number V-22-32 states that EU09 is also subject to a self-imposed PTE limit that states:

*"B(2)(c) The permittee shall not discharge or cause to be discharged emissions in excess of 0.005 grains of PM per dry standard cubic foot."*

According to the information contained in your request, you seek an alternative test method to allow the duration of each performance test run to be 1-hour in lieu of the 3-hour minimum required by §63.1511(b)(2).

In your request, you provided information demonstrating that EU09 operates predominately as a batch process in order to process each customer's material separately and to prevent contamination and loss of material. The information provided to EPA also included operating data for EU09 from April 2022 through April 2023 and PM test data from the previous two performance tests. This information shows that during the last two PM performance tests, EU09 was operating well below the allowable emission limit found in §63.1505(b)(1) and the lower limit found in Kentucky Air Permit Number V-22-32.

With this letter, and in order to continue to allow you to process each customer's material separately while still conducting the required performance test at a load considered to be representative of normal operations, we are approving your request to conduct 1-hour PM performance test runs in lieu of the 3-hour test runs required by §63.1511(b)(2) with the following caveats:

- All future performance tests conducted to determine compliance with §63.1505(b)(1) will be conducted at a production rate greater than 21,000 lb/hr.
- A copy of this letter must accompany the test report detailing the result of the required performance test.

If you have any questions regarding this determination, please contact Kim Garnett of my staff at 919-541-1158 or [garnett.kim@epa.gov](mailto:garnett.kim@epa.gov).

Sincerely,

STEFFAN  
JOHNSON

Digitally signed by  
STEFFAN JOHNSON  
Date: 2023.07.11 09:31:38  
-04'00'

Steffan M. Johnson  
Group Leader  
Measurement Technology Group

cc:	Cynthia Arnold, Owl's Head Alloys, Inc	( <a href="mailto:carnold@ohaky.com">carnold@ohaky.com</a> )
	Kim Garnett, EPA/OAQPS/AQAD	( <a href="mailto:garnett.kim@epa.gov">garnett.kim@epa.gov</a> )
	Michael Kennedy, KY EEC	( <a href="mailto:michael.kennedy@ky.gov">michael.kennedy@ky.gov</a> )
	Theresa Lowe, EPA/OAQPS/SPPD	( <a href="mailto:lowe.theresa@epa.gov">lowe.theresa@epa.gov</a> )
	Chandler Millhollin, EPA Region IV	( <a href="mailto:milhollin.chandler@epa.gov">milhollin.chandler@epa.gov</a> )
	Jen Smith, JB-Air Consulting	( <a href="mailto:jen@jb-air.com">jen@jb-air.com</a> )
	Marion Watson, EPA Region IV	( <a href="mailto:watson.marion@epa.gov">watson.marion@epa.gov</a> )