



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 4, 2010

CERTIFIED MAIL

John S. Lyons, Director
Division for Air Quality
Department for Environmental Protection
Kentucky Natural Resources & Environmental
Protection Cabinet
200 Fair Oaks Lane, 1st Floor
Frankfort, Kentucky 40601

Dear Mr. Lyons:

The United States Environmental Protection Agency (EPA) has reviewed the proposed title V permit renewal for Century Aluminum of Kentucky, LLC (permit no. V-08-012). The package was proposed to EPA on August 20, 2010. Based on the review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of section 505(b) of the Clean Air Act and 40 CFR 70.8(c), to the issuance of the title V permit for this facility.

EPA previously provided comments on the proposed permit to the Kentucky Department for Air Quality (KDAQ) in an electronic memorandum dated September 23, 2010. The memorandum listed six significant comments; KDAQ has since adequately addressed items 4 through 6 in an email (to EPA) dated October 1, 2010. Therefore, EPA's objection is based on the following unresolved issues:

1. The ability to average emissions from both existing and new units in Condition 2.g under Section B for the anode bake furnaces (to demonstrate compliance with the limits in Table 3 of Subpart LL) is in direct conflict with 40 CFR 63.846(d)(4)(ii). Emissions from the two existing units may be averaged, but emissions from the new unit must stand alone with respect to demonstrating compliance with the limits specified in 40 CFR 63.844(c).
2. EPA acknowledges the response to the concerns regarding the completeness of the sulfur dioxide best available control technology analysis (for the potlines and anode bake furnaces) expressed in EPA's electronic submittal of comments dated January 27, 2010; however, the response is deemed to be inadequate. Following a review of the online version of the referenced document (the United States Energy Information Administration's *Electric Power Annual Data for 2008*, released January 21, 2010), it was not immediately apparent where the information exists to support the applicant's

claim that future acquisition of raw materials of less than 3.0 percent sulfur content (or even closer to the 2.1 percent that is currently being used by the facility) will be very limited, if at all possible. Furthermore, the applicant needs to assess the costs associated with acquiring the lower sulfur (yet limited) raw materials.

3. Based on a review of the permitting record, it appears that a monitoring plan for emission control devices has not yet been submitted. Pursuant to 40 CFR 63.848(f), the applicant must submit to the regulatory authority (for approval) a monitoring plan to include: descriptions of the parameters to be monitored, the monitoring frequency to ensure that the control device is being properly operated and maintained, an explanation of the criteria used to select the parameters, and the operating times. In the absence of said plan, EPA is unable to evaluate the adequacy of the required monitoring and, thus, ensure compliance with the applicable maximum achievable control technology standard.

We are committed to working with you to resolve the above issues. Please let us know if we may provide assistance to you and your staff. If you have any questions or wish to discuss this further, please contact Gregg Worley, Chief, Air Permits Section, at (404) 562-9141. Should your staff need further assistance, they may also contact Art Hofmeister, Kentucky title V contact, at (404) 562-9115.

Sincerely,



Beverly H. Banister
Director
Air, Pesticides and Toxics
Management Division

cc: Kenneth Sands, Century Aluminum