

Message

From: Bolen, Brittany [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31E872A691114372B5A6A88482A66E48-BOLEN, BRIT]
Sent: 3/14/2018 10:38:24 PM
To: Curt Wells [cwells@aluminum.org]; Dravis, Samantha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ece53f0610054e669d9dffe0b3a842df-Dravis, Sam]
CC: Lauren Wilk [lwilk@aluminum.org]
Subject: RE: 3/6/18 Aluminum Association Meeting Follow Up

Thanks, Curt.

From: Curt Wells [mailto:cwells@aluminum.org]
Sent: Friday, March 9, 2018 10:32 PM
To: Dravis, Samantha <dravis.samantha@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>
Cc: Lauren Wilk <lwilk@aluminum.org>
Subject: 3/6/18 Aluminum Association Meeting Follow Up

Samantha/Brittany –

Thank you for taking the time to meet with Aluminum Association representatives earlier this week. As the time for our meeting was unfortunately abbreviated, below is a summary of the agenda items (discussed and not) along with related action items.

SO2 NAAQS

The Association requests that an alternative compliance form for the 75 ppb hourly standard be considered and provided as part of the current SO2 NAAQS review process. This alternative would continue to be protective of human health and be based on hours rather than days. This is a major issue for the US aluminum smelter base and the Association will follow up with Clint Woods in the EPA Air Office for additional engagement on this issue.

Roundtop Furnace Testing

The 2015 Secondary Aluminum NESHAP RTR revisions included an exemption from testing hooding for existing roundtop furnaces but not for new furnaces. Unfortunately, inherent characteristics in roundtop furnace design involving lifting the furnace lid on and off prevent hooding during testing. Uncertainty in approving the impracticality of hooding for new round top furnaces has resulted in delays installing and testing roundtop furnaces that support growth and expansion opportunities and the Association requests that new furnaces be provided the same exemption as existing furnaces.

Water Quality Criteria and Test Methods

The Association is supportive of EPA's efforts to update the aluminum water quality criteria that date from 1988 and are not reflective of current science. A critically important corollary to that work is the need to modify the aluminum in water test method to capture only the bioavailable fraction of aluminum present in the waterbody to compare against the criteria. The Association is meeting with OW staff on Wednesday 3/14 to advance this issue.

TSCA CDR

The Association previously submitted petitions to exclude aluminum oxide and aluminum in massive form from the list of CDR reported compounds. These requests were denied based on EPA's desire to review the 2012 and 2016 CDR data. With this review now complete, the Association plans to resubmit the petitions for EPA consideration. In addition, the Association looks forward to engaging on EPA's upcoming rulemaking on inorganic byproduct reporting as aluminum related byproducts are currently affected by this reporting.

Smart Sectors

The aluminum industry is interested in pursuing an aluminum Smart Sector. Engagement with Daisy Letendre on this has been initiated per your suggestion.

Mobile Source GHG Rules

Aluminum can be of significant benefit in GHG reduction through vehicle lightweighting and strong standards coupled with the regulatory certainty of a program harmonized across EPA, NHTSA, and CARB is important in ensuring the viability of current and future investments to support the growth of aluminum use in vehicle lightweighting applications.

Manufacturing Environmental Priorities

The Association supports EPA’s efforts to reform the NSR/PSD permitting process, revise the Clean Power Plan, and clarify WOTUS.

Thanks again for your engagement this week and we look forward to further working with you and the EPA Office of Policy.



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