



Flat Rolled Products

Trentwood Works

November 9, 2016

Ms. Katharine Owens
Environmental Engineer
Stationary Source Unit
U. S. Environmental Protection Agency
1200 6th Avenue (OAW-150)
Seattle, WA 98101

**Re: Kaiser Aluminum Trentwood Works
Spokane Valley, WA
Hoarding Impracticability Determination Request**

Dear Ms. Owens:

In response to your e-mail to me dated September 29, 2016 and our conversation of October 14, 2016, Kaiser Aluminum Trentwood Works is providing the following additional information related to its August 19, 2016 Hoarding Impracticability Determination Request. This additional information including details related to projected future capital projects and their implementation timeframes.

Our 2016 five-year capital plan projection includes the conversion of two existing conventional cold air burner system equipped round top melting furnaces to more energy efficient regenerative burner systems. These conversions are being considered in order to meet future requirements of the Washington State Department of Ecology's newly effective carbon dioxide emission reduction requirements (WAC 173-442).

The 2016 five-year capital plan calls for the completion of construction and the start-up of two melting furnaces, one each in 2019 and 2020. In order to have these two conversions completed on this schedule, work on detailed design and permitting would need to begin in late 2017 for the first round top melting furnace and in late 2018 for the second round top melting furnace. It is projected that completion of construction and the start-up of the two melting furnaces would be one in 2019 and one in 2020.

In order to complete the necessary planning, permitting, and design requirements for such capital investments, Kaiser expeditiously needs and respectfully requests a hoarding impracticability determination for two round top melters located in the DC-2 and in the DC-8 Casting Complexes. Kaiser believes that the information previously provided to US EPA exceeds that required by 40 CFR §63.1512(e)(6) and (7).

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For the same reasons described on page 2 of my August 19, 2016 letter to Ms. Gina McCarthy, round top melting furnaces are the preferred equipment with respect to our existing Casthouse operations for the casting of rolling ingots. In addition to the reasons cited in my August 19, 2016 letter on page 2, these round top melting furnaces will utilize the same design features and operating practices to minimize emissions as described on pages 3 and 4 of my August 19, 2016 letter that is referenced above.

With respect to your e-mail request of October 20, 2016 for additional photographs, Kaiser believes that the series of photographs that have been provided fully addresses your request.

Please feel free to contact me at (509) 927-6554 if you should have any questions.

Sincerely,



Bernard P. (Bud) Leber, Jr.
Environmental Engineering Manager
Kaiser Aluminum Washington, LLC.