



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: NUCOR STEEL DECATUR, LLC
FACILITY NAME: NUCOR STEEL DECATUR, LLC
FACILITY/PERMIT NO.: 712-0037
LOCATION: DECATUR, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code 1975, §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code 1975, §§22-22A-1 to 22-22A-15, (2006 Rplc. Vol. and 2007 Cum. Supp.) and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT
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<p>1. <u>Transfer</u></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.</p>	Rule 335-3-16-.02(6)
<p>2. <u>Renewals</u></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	Rule 335-3-16-.12(2)
<p>3. <u>Severability Clause</u></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	Rule 335-3-16-.05(e)
<p>4. <u>Compliance</u></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	Rule 335-3-16-.05(f) Rule 335-3-16-.05(g)
<p>5. <u>Termination for Cause</u></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by</p>	Rule 335-3-16-.05(h)

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<p>the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	
<p>6. <u>Property Rights</u></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	Rule 335-3-16-.05(i)
<p>7. <u>Submission of Information</u></p> <p>The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.</p>	Rule 335-3-16-.05(j)
<p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	Rule 335-3-16-.05(k)
<p>9. <u>Certification of Truth, Accuracy, and Completeness:</u></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	Rule 335-3-16-.07(a)
<p>10. <u>Inspection and Entry</u></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized</p>	Rule 335-3-16-.07(b)

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<p>representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p> <ul style="list-style-type: none"> (a) Enter upon the permittee’s premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility’s equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. 	
<p>11. <u>Compliance Provisions</u></p> <ul style="list-style-type: none"> (a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. (b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. 	<p>Rule 335-3-16-.07(c)</p>
<p>12. <u>Compliance Certification</u></p> <p>A compliance certification shall be submitted annually by November 4th each year.</p> <ul style="list-style-type: none"> (a) The compliance certification shall include the following: <ul style="list-style-type: none"> (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recording Keeping Requirements); 	<p>Rule 335-3-16-.07(e)</p>

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<p>(4) Whether the method(s) or other means used to assure compliance provided continuous or intermittent data;</p> <p>(5) Such other facts as the Department may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p style="text-align: center;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="text-align: center;">and to:</p> <p style="text-align: center;">Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303</p> <p>13. <u>Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	<p>Rule 335-3-16-.13(5)</p>

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<p>14. <u>Additional Rules and Regulations</u></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>15. <u>Equipment Maintenance or Breakdown</u></p> <p>(a) In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.</p> <p>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</p> <p>(2) The expected length of time that the air pollution control equipment will be out of service;</p> <p>(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.</p> <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.</p>	<p>Rule 335-3-1-.07(1),(2)</p>

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<p>16. <u>Operation of Capture and Control Devices</u></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p>17. <u>Obnoxious Odors</u></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p>	<p>Rule 335-3-1-.08</p>
<p>18. <u>Fugitive Dust</u></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:</p> <p>(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or</p> <p>(5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.</p>	<p>Rule 335-3-4-.02</p>

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<p>19. <u>Additions and Revisions</u></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>Rule 335-3-16-.13 and .14</p>
<p>20. <u>Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p style="margin-left: 40px;">(1) The date, place, and time of all sampling or measurements;</p> <p style="margin-left: 40px;">(2) The date analyses were performed;</p> <p style="margin-left: 40px;">(3) The company or entity that performed the analyses;</p> <p style="margin-left: 40px;">(4) The analytical techniques or methods used;</p> <p style="margin-left: 40px;">(5) The results of all analyses; and</p> <p style="margin-left: 40px;">(6) The operating conditions that existed at the time of sampling or measurement.</p> <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.</p>	<p>Rule 335-3-16-.05(c)(2)</p>
<p>21. <u>Reporting Requirements</u></p> <p>(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations,</p>	<p>Rule 335-3-16-.05(c)(3)</p>

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<p>including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	
<p>22. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department’s air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).</p> <p>(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p>	<p>Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)</p> <p>Rule 335-3-1-.04</p> <p>Rule 335-3-1-.04</p>

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<p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	
<p>23. <u>Payment of Emission Fees</u></p> <p>Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code r. 335-1-7-.04.</p>	<p>Rule 335-1-7-.04</p>
<p>24. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>Rule 335-3-1-.04(1)</p>
<p>25. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	<p>40 CRR Part 82</p>
<p>26. <u>Chemical Accidental Prevention Provisions</u></p> <p>If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p>	<p>40 CFR Part 68</p>

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<p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,</p> <p>(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.</p>	
<p>27. <u>Display of Permit</u></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.</p>	<p>Rule 335-3-14-.01(1)(d)</p>
<p>28. <u>Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>Rule 335-3-1-.10</p>
<p>29. <u>Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>Rule 335-3-4-.01(1)</p>
<p>30. <u>Fuel-Burning Equipment</u></p> <p>(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.</p> <p>(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.</p>	<p>Rule 335-3-4-.03</p> <p>Rule 335-3-5-.01</p>
<p>31. <u>Process Industries – General</u></p>	

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<p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.</p>	Rule 335-3-4-.04
<p>32. <u>Averaging Time for Emission Limits</u></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	Rule 335-3-1-.05
<p>33. <u>Compliance Assurance Monitoring (CAM)</u></p> <p>Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.</p> <p>(a) Operation of Approved Monitoring</p> <p>(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).</p> <p>(2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>(3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner</p>	40 CFR 64.7

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<p>or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.</p> <p>(4) Response to excursions or exceedances.</p> <p style="padding-left: 2em;">(a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.</p> <p style="padding-left: 2em;">(b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.</p>	

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<p>(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.</p> <p>(b) Quality Improvement Plan (QIP) Requirements</p> <p>(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.</p> <p>(2) Elements of a QIP:</p> <p>A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.</p> <p>B. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for</p>	<p>40 CFR 64.8</p>

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<p>conducting one or more of the following actions, as appropriate:</p> <ul style="list-style-type: none"> (i) Improved preventive maintenance practices. (ii) Process operation changes. (iii) Appropriate improvements to control methods. (iv) Other steps appropriate to correct control performance. (v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). <p>(3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.</p> <p>(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:</p> <ul style="list-style-type: none"> A. Failed to address the cause of the control device performance problems; or B. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. <p>(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.</p> <p>(c) Reporting and Recordkeeping Requirements</p>	<p>40 CFR 64.9</p>

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<p>(1) General reporting requirements</p> <p style="margin-left: 20px;">A. On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-16-.05(c)3.</p> <p style="margin-left: 20px;">B. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)3. and the following information, as applicable:</p> <p style="margin-left: 40px;">(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;</p> <p style="margin-left: 40px;">(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and</p> <p style="margin-left: 40px;">(iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.</p> <p>(2) General recordkeeping requirements.</p> <p style="margin-left: 20px;">A. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality</p>	

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<p>improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).</p> <p>B. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.</p> <p>(d) Savings Provisions</p> <p>(1) Nothing in this part shall:</p> <p>A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.</p> <p>B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections</p>	<p>40 CFR 64.10</p>

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<p>114(a)(1) and 504(b), or state law, as applicable.</p> <p>C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.</p>	

Summary Page for Two (2) Electric Arc Furnaces & Two (2) Ladle Metallurgy Furnaces with Two (2) Meltshop Baghouses

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	PM (filterable)	0.0018 gr/dscf and 43.22 lbs/hr	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	PM (filterable & condensable)	0.0052 gr/dscf and 124 lbs/hr	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	SO ₂	154.0 lbs/hr and 0.35 lbs/ton of steel	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	NO _x	184.8 lbs/hr and 0.42 lbs/ton of steel	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	CO	1,012.0 lbs/hr and 2.3 lbs/ton of steel	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	VOC	57.2 lbs/hr and 0.13 lbs/ton of steel	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	LEad	0.88 lbs/hr and 0.002 lbs/ton of steel	Rule 335-3-14-.04 (BACT)
EP001 & EP002	Two (2) Electric Arc Furnaces and Two (2) Ladle Metallurgy Stations with Two (2) Meltshop Baghouses	Opacity	3% Opacity	Rule 335-3-14-.04 (BACT) & 40 CFR §60.272a(a)(2)
Melt Shop Building	Melt Shop Building	Opacity	6% Opacity	Rule 335-3-14-.04 (BACT) & 40 CFR §60.272a(a)(3)
Baghouse Dust Handling System	Baghouse Dust Handling System	Opacity	10% Opacity	Rule 335-3-14-.04 (BACT) & 40 CFR §60.272a(b)

Provisos for Two (2) Electric Arc Furnaces & Two (2) Ladle Metallurgy Furnaces with Two (2) Meltshop Baghouses

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".	Rule 335-3-14-.04 (BACT)
3. The electric arc furnace is subject to New Source Performance Standard (NSPS) Subpart AAa, "Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 7, 1983".	40 CFR 60 Subpart AAa
4. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYY, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities".	40 CFR Part 63 Subpart YYYYY
5. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart A, "General Provisions", as provided in Table 1 of 40 CFR Part 63 Subpart YYYYY.	40 CFR Part 63 Subpart A
6. For particulate matter emissions, these sources are subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64
Emission Standards	
1. The production of molten (ladled) steel by the electric arc furnaces shall not exceed 3,200,000 tons during any consecutive twelve (12) month period.	Rule 335-3-14-.04 (BACT)
2. Emissions from the stacks associated with the meltshop baghouses shall not exceed three percent (3%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT) & 40 CFR §60.272a(a)(2)
3. Emissions from the roof or any openings of the building enclosure associated with the electric arc furnace shall not exceed six percent (6%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT) & 40 CFR §60.272a(a)(3)
4. Emissions from any dust handling system shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT) & 40 CFR §60.272a(b)

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5. Filterable particulate matter emissions from the stacks associated with the meltshop baghouses shall not exceed an outlet grain loading of 0.0018 gr/dscf and a mass emission rate of 43.22 lbs/hr.	Rule 335-3-14-.04 (BACT)
6. Total particulate matter emissions (Filterable and Condensable) from the stacks associated with the meltshop baghouses shall not exceed an outlet grain loading of 0.0052 gr/dscf and a mass emission rate of 124 lbs/hr.	Rule 335-3-14-.04 (BACT)
7. The sulfur content of the injection carbon utilized in the EAFs shall not exceed 2.0% by weight.	Rule 335-3-14-.04 (BACT)
8. Sulfur Dioxide emissions from the stacks associated with the meltshop baghouses shall not exceed a mass emission rate of 0.35 lb/ton of steel produced and 154 lbs/hr.	Rule 335-3-14-.04 (BACT)
9. Nitrogen Oxide emissions from the stacks associated with the meltshop baghouses shall not exceed a mass emission rate 0.42 lb/ton of steel produced and 184.8 lbs/hr.	Rule 335-3-14-.04 (BACT)
10. Carbon monoxide emissions from the stacks associated with the meltshop baghouses shall not exceed a mass emission rate of 2.3 lb/ton of steel produced and 1,012 lbs/hr.	Rule 335-3-14-.04 (BACT)
11. Volatile Organic Compound (VOC) emissions as propane from the stacks associated with the meltshop baghouses shall not exceed a mass emission rate of 0.13 lb/ton of steel produced and 57.2 lb/hr.	Rule 335-3-14-.04 (BACT)
12. Lead emissions from the stacks associated with the meltshop baghouses shall not exceed a mass emission rate of 0.002 lb/ton of steel produced and 0.88 lb/hr.	Rule 335-3-14-.04 (BACT)
13. All dust handling systems (screw conveyors, silos, dumpsters, etc.) from baghouse hoppers shall be enclosed to prevent fugitive emissions from these handling systems.	Rule 335-3-14-.04 (BACT)
14. All major roads shall be paved and curbed. A drawing or diagram showing major roadway areas shall be submitted to the Department for approval. The Department may add or remove areas from the list of major roadways based on the amount of dust generated by the traffic on the roadways.	Rule 335-3-14-.04 (BACT)
15. All paved roads shall be vacuum swept or flushed of surface material every third consecutive day. The vacuum sweeper shall have a minimum blower capacity of 12,000 cfm, and the flushing machine shall dispense water at the rate of 0.32 gal/yd ² .	Rule 335-3-14-.04 (BACT)
16. All paved parking areas shall be vacuum swept or flushed of surface material every calendar quarter. The vacuum sweeper shall have a minimum blower capacity of 12,000 cfm,	Rule 335-3-14-.04 (BACT)

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and the flushing machine shall dispense water at the rate of 0.32 gal/yd ² .	
17. Paved road or area flushing specified in Provisos 15 and 16 of the emissions standards section is not required when the temperature is below 32°F. Paved road or area cleaning is not required when precipitation during the previous 24-hour period has exceeded 0.01 inches.	Rule 335-3-14-.04 (BACT)
18. Storage piles, storage silos, and material handling systems for iron and steel scrap, hot briquette iron, pig iron, iron carbide, fluxing materials and alloy agents shall be maintained in such a way to minimize the generation of dust. Possible methods to suppress dust include but are not limited to, maintaining storage piles covered or wet, utilizing covered or enclosed conveying systems, bin vents, wet screens, etc.	Rule 335-3-14-.04 (BACT)
19. Storage piles and material handling systems for direct reduced iron shall be maintained in such a way to minimize the generation of dust. The direct reduced iron shall be stored in a manner to prevent fugitive dust from becoming airborne due to wind entrainment or material handling.	Rule 335-3-14-.04 (BACT)
20. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYY, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities". To include the Emission standards and Compliance Requirements in §63.10685(a) & (b) and §63.10686(a) & (b).	40 CFR §63.10685 40 CFR §63.10686
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter (filterable) emissions.	Rule 335-3-1-.05
3. Method 202 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of total particulate matter (filterable and condensable emissions).	Rule 335-3-1-.05
4. Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
5. Method 7e of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
6. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05

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7. Method 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
8. Method 12 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of lead emissions.	Rule 335-3-1-.05
9. These sources are subject to the applicable requirements of 40 CFR Part 60 Subpart AAa, "Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983." To include the Test Methods and Procedures in §60.275a(a),(b),(c),(d),(e),(f),(g),(h),(i),(j).	40 CFR §60.275a
10. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYY, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities". To include the Test Methods and Procedures in §63.10686(d).	40 CFR §63.10686
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64
2. These sources are subject to the applicable requirements of 40 CFR Part 60 Subpart AAa, "Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983." To include the Monitoring standards in §60.273a(a),(b),(d) and §60.274a(a),(b),(c),(d),(e),(f),(g),(h).	40 CFR §60.273a 40 CFR §60.274a
3. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYY, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities", to include the Monitoring Requirements in §63.10686(e).	40 CFR §63.10686
4. Particulate and Visible Emissions tests are to be conducted at intervals not to exceed 12 months following the date of initial compliance testing. All test reports must be submitted to the Department within 45 days of completion of testing.	Rule 335-3-14-.04 (BACT), 40 CFR §60.276a(f), & 40 CFR Part 64
5. During any performance test required under this permit or to determine compliance with provisions of this permit, the owner or operator shall monitor the following information for all heats covered by the test:	40 CFR §60.276a(f)
(a) Charge weights and materials, and tap weights and materials;	

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<p>(b) Heat times, including start and stop times, and a log of process operation, including periods of no operation during testing and the pressure inside an EAF when direct-shell evacuation control systems are used;</p> <p>(c) Control device operation log; and</p> <p>(d) Continuous opacity monitor or Method 9 data.</p> <p>This information shall be included in any test report.</p>	
<p>6. The Continuous Opacity Monitoring System (COMS) which conforms to 40 CFR Part 60, Appendix B, Performance Specification 1 will be operated and maintained on the stacks associated with the electric arc furnaces and ladle metallurgy furnaces baghouses. COMS data will be used to monitor compliance with the opacity standard.</p>	<p>Rule 335-3-14-.04 (BACT) & 40 CFR Part 64</p>
<p>7. The Permittee shall perform observations of the opacity of emissions from the meltshop at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. If any visible emissions are noted, the permittee shall take appropriate actions as necessary to eliminate the observed emissions immediately.</p>	<p>40 CFR §60.273a(d) & 40 CFR Part 64</p>
<p>8. The Permittee shall continuously measure and record the pressure differential between the inlet and exhaust of the Meltshop Baghouses to determine if the pressure differential is between 2 to 12 inches of H₂O for the North Meltshop Baghouse (EP001) and between 4 to 16 inches of H₂O for the South Meltshop Baghouse (EP002). Whenever the pressure differential is outside of the range, maintenance inspections and/or corrective action are to be initiated.</p>	<p>Rule 335-3-16-.05(c) & 40 CFR Part 64</p>
<p>9. The Permittee shall establish values for the control system fan motor amperes and all damper positions during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility during compliance testing. The facility shall check and record the control system fan motor amperes and damper positions at least once per shift.</p>	<p>40 CFR §60.274a(b)</p>
<p>10. The Permittee shall perform a visual check of the Dust Handling Equipment at least once per day. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, the permittee shall perform a Method 9 and take appropriate actions as necessary to eliminate the observed emissions immediately.</p>	<p>Rule 335-3-16-.05(c)</p>

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| 11. The Permittee shall operate a well-maintained direct evacuation canopy (DEC). Inspections shall be conducted to ensure proper operation at least once per quarter. If any problems are noted, the permittee shall take appropriate actions as necessary to correct the problem. | Rule 335-3-16-.05(c) |
| 12. The Permittee shall monitor the sulfur content from each load received of injection carbon utilized in the EAF. The permittee may use vendor test data or shipment certifications to verify the sulfur content in the injection carbon. If the sulfur content in the injection carbon is greater than 2.0%, the department must be notified within 24 hours. | Rule 335-3-16-.05(c) |

Recordkeeping and Reporting Requirements

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| 1. These sources are subject to the applicable requirements of 40 CFR Part 60 Subpart AAa, "Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983" to include the Recordkeeping and Reporting standards in §60.276a(a),(b),(c),(d),(e),(f),(g). | 40 CFR §60.276a |
| 2. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYY, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities" to include the Recordkeeping and Reporting Requirements in §63.10685(c) and §63.10690(b). | 40 CFR §63.10685(c)
40 CFR §63.10690(b) |
| 3. Records of the monthly and 12-month rolling total steel production shall be maintained in a form suitable for inspection. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request. | Rule 335-3-16-.05(c) |
| 4. The Permittee shall submit a written report of exceedances of the EAF Shop and Dust Handling Equipment opacity limits to the Department semi-annually. For the purposes of these reports, exceedances are defined as any observed opacity observations in excess of the emission limit specified in the permit. Copies of any Method 9 observations performed shall be included with the report. | Rule 335-3-16-.05(c) |
| 5. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request. | Rule 335-3-16-.05(c) |
| 6. The Permittee shall submit a written report of exceedances of the control device opacity as indicated by the COMs, to the Department semi-annually. For the purposes of these reports, exceedances are defined as all 6-minute periods | Rule 335-3-16-.05(c) |

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<p>during which the average opacity is 3 percent or greater.</p>	
<p>7. The Permittee shall maintain a record of all inspections of the DEC. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</p>	<p>Rule 335-3-16-.05(c)</p>
<p>8. The Permittee shall maintain at its plant premises, and make available for inspection, records documenting each occasion on which paved area are cleaned in accordance with this permit and any occasion on which such paved areas are not cleaned according to the required schedule, including any justification for failure to meet the required schedule, such as equipment breakdown or inclement weather conditions. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</p>	<p>Rule 335-3-16-.05(c)</p>
<p>9. Records of the sulfur content in the injection carbon utilized in the EAF shall be maintained in a form suitable for inspection. These records shall be kept on site for a period of at least five (5) years.</p>	<p>Rule 335-3-16-.05(c)</p>

Summary Page for Tunnel Furnace

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP003	Tunnel Furnace	PM	2.7 lb/hr and 10 lb/MMFt ³ of Natural Gas Burned	Rule 335-3-14-.04 (BACT)
EP003	Tunnel Furnace	NO _x	38.34 lb/hr and 142.0 lb/ MMFt ³ of Natural Gas Burned	Rule 335-3-14-.04 (BACT)
EP003	Tunnel Furnace	CO	18.9 lb/hr and 70 lb/ MMFt ³ of Natural Gas Burned	Rule 335-3-14-.04 (BACT)
EP003	Tunnel Furnace	VOC	0.38 lb/hr and 1.4 lb/ MMFt ³ of Natural Gas Burned	Rule 335-3-14-.04 (BACT)
EP003	Tunnel Furnace	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Tunnel Furnace

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]."	Rule 335-3-14-.04 (BACT)
Emission Standards	
1. Particulate matter emissions from the tunnel furnace shall not exceed 2.7 lb/hr and 10.0 lb/MMFt ³ of natural gas burned	Rule 335-3-14-.04 (BACT)
2. Nitrogen oxide emissions from the tunnel furnace shall not exceed 38.34 lb/hr and 142.0 lb/MMFt ³ of natural gas burned	Rule 335-3-14-.04 (BACT)
3. Carbon monoxide emissions from the tunnel furnace shall not exceed 18.9 lb/hr and 70.0 lb/MMFt ³ of natural gas burned	Rule 335-3-14-.04 (BACT)
4. Volatile Organic Compound (VOC) emissions as propane from the tunnel furnace shall not exceed 0.38 lb/hr and 1.4 lb/MMFt ³ of natural gas burned	Rule 335-3-14-.04 (BACT)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3. Method 7e of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide emissions.	Rule 335-3-1-.05
5. Method 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05

Federally Enforceable Provisos**Regulations****Emission Monitoring**

1. The Permittee shall perform a visual check, at least once per day, of the stacks associated with the tunnel furnace. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 10 % are noted, and not corrected within a period of one (1) hour, then a Method 9 must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs of observed problems shall be recorded.

Rule 335-3-16-.05(c)

Recordkeeping and Reporting Requirements

1. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of Proviso 1 of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.

Rule 335-3-16-.05(c)

Summary Page for Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Hot Mill)

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP012-1	Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Hot Mill)	HCl*	0.95 lbs/hr (4.16 TPY)	Rule 335-3-14-.04 (BACT)
EP012-1	Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Hot Mill)	Opacity	See General Provisos	Rule 335-3-4-.01(1)

***Combined Emission Limit from Hot Mill Pickle Line (EP012-1) and Tank Farm (EP012-2)**

Provisos for Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Hot Mill)

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This unit has an enforceable limit in order to prevent it from being subject to the provisions of 40 CFR Part 63.	40 CFR Part 63 (MACT Avoidance)
3. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64 (CAM)
Emission Standards	
1. The combined Hydrogen chloride (HCl) emissions from the hot mill steel pickling line (EP012-1) and the Tank Farm (EP012-2) shall not exceed 0.95 lbs/hr and 4.16 TPY.	40 CFR Part 63 (MACT Avoidance)
2. Emissions of Hazardous Air Pollutants (HAPs) from all operations from the entire facility shall not exceed 9.9 tons for a single HAP and 24.9 tons for a combination of HAPs in any consecutive rolling 12-month period.	40 CFR Part 63 (MACT Avoidance)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 26a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of HCl emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64 (CAM)
2. The Permittee shall perform a visual check, at least once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If estimated instantaneous visible emissions in excess of 10% opacity are observed, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos**Regulations**

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| 3. The Permittee shall monitor and record, at least once per day, the differential pressure between the inlet and outlet of the scrubber to determine if the pressure differential is between 1.5 to 10.0 inches of H ₂ O. Corrective action must be performed within (2) two hours if the pressure differential falls out of range. Any repairs or observed problems shall be recorded. | Rule 335-3-16-.05(c) & |
| 4. The Permittee shall monitor and record, at least once per day, the scrubber recirculation liquid flow rate to determine if the flow rate is between 115 to 125 gallons per minute. Corrective action must be performed within (2) two hours if the liquid flow rate falls out of range. Any repairs or observed problems shall be recorded. | Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM) |

Recordkeeping and Reporting Requirements

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| 1. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. The Permittee shall maintain a record of the pressure drop across the scrubber required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 3. The Permittee shall maintain a record of the liquid flow rate required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |

Summary Page for Tank Farm – 4 HCL Tanks and 8 Pickle Liquor Tanks with Wet Scrubber

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP012-2	Tank Farm – 4 HCL Tanks and 8 Pickle Liquor Tanks with Wet Scrubber	HCl*	0.95 lbs/hr (4.16 TPY)	Rule 335-3-14-.04 (BACT)
EP012-2	Tank Farm – 4 HCL Tanks and 8 Pickle Liquor Tanks with Wet Scrubber	Opacity	See General Provisos	Rule 335-3-4-.01(1)

***Combined Emission Limit from Hot Mill Pickle Line (EP012-1) and Tank Farm (EP012-2)**

Provisos for Tank Farm – 4 HCL Tanks and 8 Pickle Liquor Tanks with Wet Scrubber

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These units have an enforceable limit in order to prevent it from being subject to the provisions of 40 CFR Part 63.	40 CFR Part 63 (MACT Avoidance)
3. These sources are subject to the applicable requirements of 40 CFR Part 64, “Compliance Assurance Monitoring”, to include General Proviso # 33.	40 CFR Part 64 (CAM)
Emission Standards	
1. The combined Hydrogen chloride (HCl) emissions from the hot mill steel pickling line (EP012-1) and the Tank Farm (EP012-2) shall not exceed 0.95 lbs/hr and 4.16 TPY.	40 CFR Part 63 (MACT Avoidance)
2. Emissions of Hazardous Air Pollutants (HAPs) from all operations from the entire facility shall not exceed 9.9 tons for a single HAP and 24.9 tons for a combination of HAPs in any consecutive rolling 12-month period.	40 CFR Part 63 (MACT Avoidance)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 26A of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of HCl emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, “Compliance Assurance Monitoring”.	40 CFR Part 64 (CAM)
2. The Permittee shall perform a visual check, at least once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If estimated instantaneous visible emissions in excess of 10% opacity are observed, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos**Regulations**

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| 3. The Permittee shall monitor and record, at least once per day, the differential pressure between the inlet and outlet of the scrubber to determine if the pressure differential is between 0.5 to 6.0 inches of H ₂ O. Corrective action must be performed within (2) two hours if the pressure differential falls out of range. Any repairs or observed problems shall be recorded. | Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM) |
| 4. The Permittee shall monitor and record, at least once per day, the scrubber recirculation liquid flow rate to determine if the flow rate is between 11.4 to 57.0 gallons per minute. Corrective action must be performed within (2) two hours if the liquid flow rate falls out of range. Any repairs or observed problems shall be recorded. | Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM) |

Recordkeeping and Reporting Requirements

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| 1. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. The Permittee shall maintain a record of the pressure drop across the scrubber required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 3. The Permittee shall maintain a record of the liquid flow rate required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 4. Records of the date and time of each truck unloading and confirmation that the scrubber was operating during the time of the truck being unloaded shall be recorded. The records shall be maintained for at least five (5) years from the date of generation and shall be made available upon request. | Rule 335-3-16-.05(c) |

Summary Page for Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	PM	$E=1.38H^{0.44}$	Rule 335-3-4-.03
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	SO ₂	See General Provisos	Rule 335-3-5-.01(b)
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	NO _x	N/A	N/A
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	CO	N/A	N/A
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	VOC	N/A	N/A
EP0016 & EP017	Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Two Natural Gas-Fired Boilers (8.37 MMBtu/hr, each) Hot Mill

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
Emission Standards	
1. These units shall combust natural gas only.	Rule 335-3-14-.04 (Anti-PSD)
2. Particulate matter emissions from each boiler shall not exceed the allowable set by Rule 335-3-4-.03(1).	Rule 335-3-4-.03(1)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3. Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A

Summary Page for Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Cold Mill)

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP004	Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Cold Mill)	HCl	0.99 lbs/hr (4.33 TPY)	40 CFR Part 63 (MACT Avoidance)
EP004	Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Cold Mill)	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Push-Pull Hydrochloric Acid Pickling Line with Wet Scrubber (Cold Mill)

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This unit has an enforceable limit in order to prevent it from being subject to the provisions of 40 CFR Part 63.	40 CFR Part 63 (MACT Avoidance)
3. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64 (CAM)
Emission Standards	
1. Hydrogen Chloride (HCl) emissions from the cold mill steel pickling line shall not exceed 0.99 lbs/hr and 4.33 TPY.	40 CFR Part 63 (MACT Avoidance)
2. Emissions of Hazardous Air Pollutants (HAPs) from all operations from the entire facility shall not exceed 9.9 tons for a single HAP and 24.9 tons for a combination of HAPs in any consecutive rolling 12-month period.	40 CFR Part 63 (MACT Avoidance)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 26a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of HCl emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64 (CAM)
2. The Permittee shall perform a visual check, at least once per day, of the stack associated with this unit. This check shall be performed by a person familiar with Method 9. If estimated instantaneous visible emissions in excess of 10% opacity are observed, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos

Regulations

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| <p>3. The Permittee shall monitor and record, at least once per day, the differential pressure between the inlet and outlet of the scrubber to determine if the pressure differential is between 4.0 to 10.0 inches of H₂O. Corrective action must be performed within (2) two hours if the pressure differential falls out of range. Any repairs or observed problems shall be recorded.</p> | <p>Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM)</p> |
| <p>4. The Permittee shall monitor and record, at least once per day, the scrubber recirculation liquid flow rate to determine if the flow rate is between 100 to 150 gallons per minute. Corrective action must be performed within (2) two hours if the liquid flow rate falls out of range. Any repairs or observed problems shall be recorded.</p> | <p>Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM)</p> |

Recordkeeping and Reporting Requirements

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| <p>1. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.</p> | <p>Rule 335-3-16-.05(c)</p> |
| <p>2. The Permittee shall maintain a record of the pressure drop across the scrubber required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.</p> | <p>Rule 335-3-16-.05(c)</p> |
| <p>3. The Permittee shall maintain a record of the liquid flow rate required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.</p> | <p>Rule 335-3-16-.05(c)</p> |

Summary Page for Cold Mill Hydrochloric Acid Storage Tanks with Mini Scrubber

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP010	Cold Mill Hydrochloric Acid Storage Tanks with Mini Scrubber	HCl	N/A	N/A
EP010	Cold Mill Hydrochloric Acid Storage Tanks with Mini Scrubber	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Cold Mill Hydrochloric Acid Storage Tanks with Mini Scrubber

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These units have an enforceable limit in order to prevent it from being subject to the provisions of 40 CFR Part 63.	40 CFR Part 63 (MACT Avoidance)
Emission Standards	
1. Emissions of Hazardous Air Pollutants (HAPs) from all operations from the entire facility shall not exceed 9.9 tons for a single HAP and 24.9 tons for a combination of HAPs in any consecutive rolling 12-month period.	40 CFR Part 63 (MACT Avoidance)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 26A of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of HCl emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The hydrogen chloride (HCl) fumes shall be vented through a mini packed tower scrubber while trucks are unloading fresh or regenerated acid to the hydrochloric acid storage tanks.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. Records of the date and time of each truck unloading and confirmation that the scrubber was operating during the time of the truck being unloaded shall be recorded. The records shall be maintained for at least five (5) years from the date of generation and shall be made available upon request.	Rule 335-3-16-.05(c)

Summary Page for Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	PM	$E=1.38H^{-0.44}$	Rule 335-3-4-.03
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	SO ₂	See General Provisos	Rule 335-3-5-.01(b)
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	NO _x	N/A	N/A
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	CO	N/A	N/A
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	VOC	N/A	N/A
EP0014 & EP015	Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Two Natural Gas-Fired Boilers (16.8 MMBtu/hr, each) Cold Mill

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
Emission Standards	
1. These units shall combust natural gas only.	Rule 335-3-14-.04 (Anti-PSD)
2. Particulate matter emissions from each boiler shall not exceed the allowable set by Rule 335-3-4-.03(1).	Rule 335-3-4-.03(1)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3. Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A

Summary Page for Rolling Mills

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP008	Tandem Mill	PM	12.1 lbs/hr or the allowable set by 335-3-4-.04	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
EP008	Tandem Mill	VOC	N/A	N/A
EP008	Tandem Mill	Opacity	See General Provisos	Rule 335-3-4-.01(1)
EP009	Wet Temper Mill	PM	1.0 lbs/hr or the allowable set by Rule 335-3-4-.04	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
EP009	Wet Temper Mill	VOC	N/A	N/A
EP009	Wet Temper Mill	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Rolling Mills

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 “Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]”.	Rule 335-3-14-.04 (Anti-PSD)
3. These sources are subject to the applicable requirements of 40 CFR Part 64, “Compliance Assurance Monitoring”, to include General Proviso # 33.	40 CFR Part 64 (CAM)
Emission Standards	
1. The particulate matter emissions from the tandem mill (EP008) shall not exceed the lesser of 12.1 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
2. The particulate matter emissions from the wet temper mill (EP009) shall not exceed the lesser of 1.0 lbs/hrs or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The Permittee shall perform a visual check, at least once per day, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If estimated instantaneous visible emissions in excess of 10% opacity are observed, and are not corrected within a period of 1 hour, then a Method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
2. The Permittee shall establish a normal operating fan amperage for each unit and shall monitor and record the fan amperage at least once per shift. Corrective action must be performed within (2) two hours if the fan amperage falls out of the range that is established by the facility. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM)

Federally Enforceable Provisos**Regulations****Recordkeeping and Reporting Requirements**

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| 1. The Permittee shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |
| 2. The Permittee shall maintain a record of the fan amperage required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years. | Rule 335-3-16-.05(c) |

Summary Page for Annealing Furnaces and Bases

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP011	Annealing Furnaces and Bases	PM	N/A	N/A
EP011	Annealing Furnaces and Bases	SO ₂	N/A	N/A
EP011	Annealing Furnaces and Bases	NO _x	N/A	N/A
EP011	Annealing Furnaces and Bases	CO	N/A	N/A
EP011	Annealing Furnaces and Bases	VOC	N/A	N/A
EP011	Annealing Furnaces and Bases	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Annealing Furnaces and Bases

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 “Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]”.	Rule 335-3-14-.04 (Anti-PSD)
Emission Standards	
1. Natural Gas usage for all processes associated with the Cold Mill building shall not exceed 750,000,000 cubic feet during any consecutive twelve (12) month period.	Rule 335-3-14-.04 (Anti-PSD)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. Records of monthly and twelve (12) month rolling totals of natural gas usage at the facility shall be maintained in a form suitable for inspection for a period of three (3) years from the date the natural gas is consumed.	Rule 335-3-16-.05(c)

Summary Page for 106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	PM	0.75 lb/hr and 0.0076 lbs/MMBtu	Rule 334-3-14-.04 (BACT)
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	SO ₂	0.06 lbs/hr and 0.0006 lbs/MMBtu	Rule 334-3-14-.04 (BACT)
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	NO _x	6.6 lbs/hr and 0.067 lbs/MMBtu	Rule 334-3-14-.04 (BACT)
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	CO	8.3 lb/hr and 0.084 lbs/MMBtu	Rule 334-3-14-.04 (BACT)
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	VOC	0.55 lb/hr and 0.0055 lbs/MMBtu	Rule 334-3-14-.04 (BACT)
EP018	106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for 106.87 MMBtu/hr Galvanizing Line with Selective Catalytic Reduction

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-14-.04, “Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)].”	Rule 335-3-14-.04 (BACT)
3. This source is subject to the applicable requirements of 40 CFR Part 64, “Compliance Assurance Monitoring”, to include General Proviso # 33.	40 CFR Part 64 (CAM)
Emission Standards	
1. Particulate matter emissions from the galvanizing line shall not exceed 0.75 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (BACT)
2. Sulfur dioxide emissions from the galvanizing line shall not exceed 0.06 lb/hr and 0.0006 lbs/MMBtu.	Rule 335-3-14-.04 (BACT)
3. Nitrogen oxide emissions from the galvanizing line shall not exceed 6.6 lb/hr and 0.067 lb/MMBtu.	Rule 335-3-14-.04 (BACT)
4. Carbon monoxide emissions from the galvanizing line shall not exceed 8.3 lb/hr and 0.084 lb/MMBtu.	Rule 335-3-14-.04 (BACT)
5. Volatile Organic Compound (VOC) the galvanizing line shall not exceed 0.55 lb/hr and 0.0055 lbs/MMBtu.	Rule 335-3-14-.04 (BACT)
6. The SCR inlet flue gas temperature shall be maintained at or above 600°F prior to the injection of ammonia reagent.	Rule 335-3-14-.04 (BACT)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter (filterable) emissions.	Rule 335-3-1-.05
3. Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
4. Method 7e of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05

Federally Enforceable Provisos	Regulations
5. Method 10 of 40 CFR Part 60, Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6. Method 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64 (CAM)
2. A monitoring device for the continuous measurement and recording of the SCR inlet flue gas temperature shall be installed, operated, and maintained in accordance with manufacturer's recommendations. If the flue gas temperature falls below 600°F, the ammonia reagent flow shall be automatically shut off and the facility shall investigate and initiate any necessary corrective actions within 2 hours, unless the Permittee is running product that requires a furnace operating condition that results in flue gas temperatures less than 600°F provided the NO _x emission limit is not exceeded during these operating conditions. Such operating conditions shall be noted in the quarterly excess emissions report.	Rule 335-3-16-.05(c)
3. A CEMS for NO _x , conforming to the specifications of Appendix B and Appendix F of 40 CFR 60, shall be installed, operated and maintained on the exhaust of the Galvanizing Line Furnace with Selective Catalytic Reduction (EP018).	Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. A report of excess emissions will be submitted to the Department for each calendar quarter within 30 days following the end of the quarter. For the purposes of this report, exceedances are defined as NO _x emissions over 0.067 lb/MMBtu and 6.60 lbs/hr as computed from a 1 hour average. The report will include, at a minimum, the following information: (a) The date and time of commencement and completion of each time period of excess emissions. (b) The nature of the cause of the excess emissions (if known). The date and time identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.	Rule 335-3-16-.05(c) & 40 CFR Part 64 (CAM)

Federally Enforceable Provisos

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- (c) Equations used to convert NOx emission data as monitored to the required reporting standards (lbs/hr and lb/MMBtu) will be included with the reports.
- (d) When no excess emissions have occurred and the monitoring systems were not inoperative or did not require repairs or adjustments, such information shall be stated in the reports.
- (e) Data recorded during periods of system breakdowns, repairs, adjustments, and calibration checks shall not be included in any of the above data averages.

All the original data charts, performance evaluations, calibration checks, adjustments and maintenance records and other information regarding the monitoring systems will be maintained in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such recording.

Summary Page for NSPS Subpart III – Compression Ignition Emergency Generators (Appendix A)

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	PM	See Table 1 or Table 4 in 40 CFR Part 60 Subpart III	40 CFR Part 60 Subpart III
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	SO ₂	N/A	N/A
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	NO _x	See Table 1 or Table 4 in 40 CFR Part 60 Subpart III	40 CFR Part 60 Subpart III
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	CO	See Table 1 or Table 4 in 40 CFR Part 60 Subpart III	40 CFR Part 60 Subpart III
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	VOC	N/A	N/A
See Appendix A	NSPS Subpart III – Compression Ignition Emergency Generators	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for NSPS Subpart III – Compression Ignition Emergency Generators (Appendix A)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These sources must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart III, for compression ignition engines.	40 CFR §63.6590(c)(6)
3. These sources are subject to the applicable requirements of 40 CFR Part 60 Subpart III, “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines”.	40 CFR Part 60 Subpart III
4. These sources are subject to the applicable requirements of Subpart A of 40 CFR Part 60, "General Provisions" as listed in Table 8 of Subpart III.	40 CFR Part 60 Subpart III
Emission Standards	
1. These units are subject to the applicable emission standards listed in Table 1 to 40 CFR Part 60 Subpart III and 40 CFR §60.4202(a)(2).	40 CFR §60.4205(a) & §60.4205(b)
2. These units must be certified according to 40 CFR Part 60 Subpart III for the same model year and maximum engine power.	40 CFR §60.4205(b) & §60.4211(c)
3. These units must be installed and configured according to the manufacturer’s specifications.	40 CFR §60.4211(a), §60.4211(b), & §60.4211(c)
4. The facility must operate and maintain these units according to the manufacturer’s written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.	40 CFR §60.4206
5. These units must use diesel fuel that meets the requirements of 40 CFR §80.510(b).	40 CFR §60.4207(b)
6. The Permittee must install a non-resettable hour meter prior to startup of the engines.	40 CFR §60.4209(a)
7. These units may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units are limited to 100 hours per	40 CFR §60.4211(f)

Federally Enforceable Provisos

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year. There is no time limit on the use of these units in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year . These units may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 60 Subpart III, is prohibited.

Compliance and Performance Test Methods and Procedures

- 1. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.

Rule 335-3-1-.05

Emission Monitoring

- 1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.

N/A

Recordkeeping and Reporting Requirements

- 1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.

N/A

Summary Page for NSPS Subpart JJJJ – Spark Ignition Emergency Generators (Appendix B)

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	PM	N/A	N/A
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	SO ₂	N/A	N/A
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	NO _x	10 g/HP-hr (25<HP<130)	40 CFR Part Subpart JJJJ
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	CO	387 g/HP-hr (25<HP<130)	40 CFR Part Subpart JJJJ
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	VOC	N/A	40 CFR Part Subpart JJJJ
See Appendix B	NSPS Subpart JJJJ – Spark Ignition Emergency Generators	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for NSPS Subpart JJJJ – Spark Ignition Emergency Generators (Appendix B)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These sources must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines.	40 CFR §63.6590(c)(6)
3. These sources are subject to the applicable requirements of 40 CFR Part 60 Subpart JJJJ, “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines”.	40 CFR Part 60 Subpart JJJJ
4. These sources are subject to the applicable requirements of Subpart A of 40 CFR Part 60, "General Provisions" as listed in Table 3 of Subpart JJJJ.	40 CFR Part 60 Subpart JJJJ
Emission Standards	
1. These units are subject to the emission standards listed in Table 1 to 40 CFR Part 60 Subpart JJJJ.	40 CFR §60.4233(d) & §60.4233(e)
2. These units must be certified according to 40 CFR Part 60 Subpart JJJJ for the same model year and maximum engine power.	40 CFR §60.4243(b)
3. These units must be installed and configured according to the manufacturer’s specifications.	40 CFR §60.4243(a)(1)
4. The facility must operate and maintain these units according to the manufacturer’s written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.	40 CFR §60.4243(a)(1)
5. The Permittee must install a non-resettable hour meter on each unit.	40 CFR §60.4237
6. These units may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units are limited to 100 hours per year. There is no time limit on the use of these units in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require	40 CFR §60.4243(d)

Federally Enforceable Provisos

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maintenance and testing of emergency ICE beyond 100 hours per year . These units may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 60 Subpart JJJJ, is prohibited.

Compliance and Performance Test Methods and Procedures

- 1. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.

Rule 335-3-1-.05

Emission Monitoring

- 1. These sources are subject to no additional specific requirements other than those listed in the General Provisos.

N/A

Recordkeeping and Reporting Requirements

- 1. The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 60 Subpart JJJJ for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The following records shall be kept:
 - (a) All notifications submitted to comply with Subpart JJJJ and all documentations supporting any notification.
 - (b) Maintenance conducted on each unit.
 - (c) Documentation from the manufacturer that each engine is certified to meet the emission standards.
 - (d) Hours of operation of each unit that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

40 CFR §60.4245(a)(1), §60.4245(a)(2), & §60.4245(a)(3)

Summary Page for MACT Subpart ZZZZ – Existing Emergency Generators (Appendix C)

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	PM	N/A	N/A
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	SO ₂	N/A	N/A
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	NO _x	N/A	N/A
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	CO	N/A	N/A
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	VOC	N/A	N/A
See Appendix C	Existing Emergency Generators (Subject to only Subpart ZZZZ)	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for MACT Subpart ZZZZ – Existing Emergency Generators (Appendix C)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of 40 CFR Part 63 Subpart ZZZZ, “National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE)”.	40 CFR Part 63 Subpart ZZZZ
3. These sources are subject to the applicable requirements of Subpart A of 40 CFR Part 63, "General Provisions" as listed in Table 8 of Subpart ZZZZ.	40 CFR Part 63 Subpart ZZZZ
Emission Standards	
1. These units are subject to the applicable requirements listed in Table 2d of 40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.	40 CFR §63.6603
2. The Permittee must operate and maintain these units according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	40 CFR §63.6625(e)(3)
3. The Permittee must install a non-resettable hour meter for each unit if one is not already installed.	40 CFR §63.6625(f)
4. These units may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units are limited to 100 hours per calendar year. There is no time limit on the use of these units in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year . These units may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. The 50 hours per	40 CFR §63.6640(f)(1), (2), & (4)

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calendar year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per calendar year, as permitted in 40 CFR 63 Subpart ZZZZ, is prohibited.

Compliance and Performance Test Methods and Procedures

- 1. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity.

Rule 335-3-1-.05

Emission Monitoring

- 1. The Permittee shall perform the following activities:
 - (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

40 CFR Part 63
Subpart ZZZZ Table 2d,
§63.6625(i), &
§63.6625(j)

Or utilize an oil analysis program as described in §63.6625(i) or §636625(j).

- 2. If an oil analysis program is utilized for a stationary compression ignition engine, the Permittee must perform the oil analysis at the same frequency specified above for changing the oil. The Permittee must at a minimum analyze the following parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new, viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or percent water content (by volume) is greater than 0.5. If any of the limits are exceed, the Permittee must change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later.

40 CFR Subpart ZZZZ
§63.6625(i)

Federally Enforceable Provisos

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3. If an oil analysis program is utilized for a stationary spark ignition engine, the Permittee must perform the oil analysis at the same frequency specified above for changing the oil. The Permittee must at a minimum analyze the following parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligram of potassium hydroxide (KOH) per gram from the Total Acid Number of the oil when new, viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or percent water content (by volume) is greater than 0.5. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later.

40 CFR Subpart ZZZZ §63.6625(j)

Recordkeeping and Reporting Requirements

1. The Permittee must keep records of the parameters that are analyzed as part of the oil analysis program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

40 CFR Subpart ZZZZ §63.6625(i)

2. The Permittee must keep records of the maintenance conducted on these units in order to demonstrate that you operated and maintained these units and after-treatment control device (if any) according to your own maintenance plan.

40 CFR §63.6655(e)

3. The Permittee must keep records of the hours of operation of each engine that is recorded through the non-resettable hour meter. The facility must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

40 CFR §63.6655(f)

Appendix CAM

Compliance Plan for EP001 (North Meltshop Baghouse)

	Indicator 1	Indicator 2	Indicator 3	Indicator 4	Indicator 5
I. Indicator	Pressure Drop	Opacity	Opacity	PM Concentration	Bag Condition
Measurement Approach	Rosemount differential pressure gauge	COMs	EPA Reference Method 9	EPA Reference Method 5	Visual Inspection
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential below 2.0 inches of H ₂ O or greater than 12.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as an opacity measurement exceeding 3.0% on a 6-minute average. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as the presence of visible emissions greater than 3.0 % opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a particulate matter emission limit greater than 0.0018 gr/dscf. Excursions trigger an inspection, corrective action, a reporting requirement, and additional testing.	An excursion is defined as a failure to perform the monthly inspection. Excursions trigger a reporting requirement.
III. Performance Criteria					
A. Data Representativeness	The pressure gauge measures the pressure differential between the inlet and outlet of the baghouse.	Measurement is being made inside the exhaust of the baghouse.	Measurement is being made at the emission point (baghouse exhaust).	Measurement is being made at the emission point (baghouse exhaust).	Baghouse inspected visually for deterioration and the facility will replace bags as needed.
B. Verification of Operation Status	Not Applicable	Not Applicable	Not Applicable	Record baghouse flow rate during the stack test.	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will have a performance check quarterly. If abnormal pressure is noted, pressure taps will be checked.	The COMs will be operated in accordance with 40 CFR, Part 60, Appendix B, Performance Specifications 1 (PS1).	The observer will be familiar with Reference Method 9.	The test team will be familiar with Reference Method 5.	The baghouse will be inspected by trained and qualified personnel.
D. Monitoring Frequency	At least once every 15 minutes.	It will be measured continuously.	A 6-minute method 9 observation will be performed daily.	At least once every 12 months.	A minimum monthly inspection will be performed.
E. Data Collection Procedures	The pressure differential will be recorded with date and time.	The opacity will be recorded with date and time.	The VE observation will be recorded with the time, date, and name of the observer.	The stack test will be documented with date and name of the people conducting the test.	The baghouse inspection will be recorded with the time, date, condition of bags, how many bags were replaced, and name of the inspector.
F. Averaging Period	Instantaneous	6-minute average	6-minute average	In accordance with EPA Reference Method 5	monthly

Compliance Plan for EP002 (South Meltshop Baghouse)

	Indicator 1	Indicator 2	Indicator 3	Indicator 4	Indicator 5
I. Indicator	Pressure Drop	Opacity	Opacity	PM Concentration	Bag Condition
Measurement Approach	Rosemount differential pressure gauge	COMs	EPA Reference Method 9	EPA Reference Method 5	Visual Inspection
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential below 4.0 inches of H ₂ O or greater than 16.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as an opacity measurement exceeding 3.0% on a 6-minute average. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as the presence of visible emissions greater than 3.0 % opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a particulate matter emission limit greater than 0.0018gr/dscf. Excursions trigger an inspection, corrective action, a reporting requirement, and additional testing.	An excursion is defined as a failure to perform the monthly inspection. Excursions trigger a reporting requirement.
III. Performance Criteria					
A. Data Representativeness	The pressure gauge measures the pressure differential between the inlet and outlet of the baghouse.	Measurement is being made inside the exhaust of the baghouse.	Measurement is being made at the emission point (baghouse exhaust).	Measurement is being made at the emission point (baghouse exhaust).	Baghouse inspected visually for deterioration and the facility will replace bags as needed.
B. Verification of Operation Status	Not Applicable	Not Applicable	Not Applicable	Record baghouse flow rate during the stack test.	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will have a performance check quarterly. If abnormal pressure is noted, pressure taps will be checked.	The COMs will be operated in accordance with 40 CFR, Part 60, Appendix B, Performance Specifications 1 (PS1).	The observer will be familiar with Reference Method 9.	The test team will be familiar with Reference Method 5.	The baghouse will be inspected by trained and qualified personnel.
D. Monitoring Frequency	At least once every 15 minutes.	It will be measured continuously.	A 6-minute method 9 observation will be performed daily.	At least once every 12 months.	A minimum monthly inspection will be performed.
E. Data Collection Procedures	The pressure drop will be recorded with date and time.	The opacity will be recorded with date and time.	The VE observation will be recorded with the time, date, and name of the observer.	The stack test will be documented with date and name of the people conducting the test.	The baghouse inspection will be recorded with the time, date, condition of bags, how many bags were replaced, and name of the inspector.
F. Averaging Period	Instantaneous	6-minute average	6-minute average	In accordance with EPA Reference Method 5	monthly

Compliance Plan for EP004 (Cold Mill Pickle Line Scrubber)

	Indicator 1	Indicator 2
I. Indicator	Pressure Drop	Recirculation Water Flow
Measurement Approach	Differential Pressure Gauge	Flow Meter
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential below 4.0 inches of H ₂ O or greater than 10.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a liquid flow rate less than 100 gallons per minute (gpm) or greater than 150 gpm. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria		
A. Data Representativeness	The Differential Pressure Gauge measures the pressure differential between the inlet and outlet of the scrubber.	The Float Ball measurement device measures water flow in the scrubber recirculation loop in gallons per minute.
B. Verification of Operation Status	Not Applicable	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge must be calibrated, operated and maintained according to the manufacturer's guidance.	The flow meter must be calibrated, operated and maintained according to the manufacturer's guidance.
D. Monitoring Frequency	Measured once daily.	Measured once daily.
E. Data Collection Procedures	The pressure differential will be recorded with date and time.	The liquid flow rate will be recorded with date and time.
F. Averaging Period	Instantaneous	Instantaneous

Compliance Plan for EPO08 (Tandem Mill Mist Eliminator)

	Indicator 1
I. Indicator	Fan Motor Amps
Measurement Approach	Ammeter
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 216 amps or greater than 300 amps. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The ammeter is used to directly measure fan motor amps (current draw) for the Tandem Mill Mist Eliminator
B. Verification of Operation Status	The ammeter monitors fan motor amps continuously. System logic creates an alarm condition in the event readings fall outside of range.
C. QA/QC Practices and Criteria	The ammeter must be calibrated, operated and maintained according to the manufacturer's guidance.
D. Monitoring Frequency	Measured Continuously
E. Data Collection Procedures	The values for fan motor amps are logged into the Level II System and historical data may be retrieved at any time.
F. Averaging Period	Instantaneous

Compliance Plan for EP009 (Temper Mill Mist Eliminator)

	Indicator 1
I. Indicator	Fan Motor Amps
Measurement Approach	Ammeter
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 90 amps or greater than 120 amps. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The ammeter is used to directly measure fan motor amps (current draw) for the Tandem Mill Mist Eliminator
B. Verification of Operation Status	The ammeter monitors fan motor amps continuously. System logic creates an alarm condition in the event readings fall outside of range.
C. QA/QC Practices and Criteria	The ammeter must be calibrated, operated and maintained according to the manufacturer's guidance.
D. Monitoring Frequency	Measured Continuously
E. Data Collection Procedures	The values for fan motor amps are logged into the Level II System and historical data may be retrieved at any time.
F. Averaging Period	Instantaneous

Compliance Plan for EP012-1 (Hot Mill Pickle Line Scrubber)

	Indicator 1	Indicator 2
I. Indicator	Pressure Drop	Recirculation Water Flow
Measurement Approach	Differential Pressure Gauge	Flow Meter
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential below 1.5 inches of H ₂ O or greater than 10.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a liquid flow rate less than 115 gallons per minute (gpm) or greater than 125 gpm. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria		
A. Data Representativeness	The Differential Pressure Gauge measures the pressure differential between the inlet and outlet of the scrubber.	The flow meter measures water flow in the scrubber recirculation loop in gallons per minute.
B. Verification of Operation Status	Not Applicable	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge must be calibrated, operated and maintained according to the manufacturer's guidance.	The flow meter must be calibrated, operated and maintained according to the manufacturer's guidance.
D. Monitoring Frequency	Measured once daily.	Measured once daily.
E. Data Collection Procedures	The pressure differential will be recorded with date and time.	The liquid flow rate will be recorded with date and time.
F. Averaging Period	Instantaneous	Instantaneous

Compliance Plan for EP012-2 (Hot Mill Pickle Line Tank Farm)

	Indicator 1	Indicator 2
I. Indicator	Pressure Drop	Makeup Water Flow Rate
Measurement Approach	Differential Pressure Gauge	Flow Meter
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential below 0.5 inches of H ₂ O or greater than 6.0 inches of H ₂ O. Excursions trigger an inspection, corrective action, and a reporting requirement.	While the unit is operating, an excursion is defined as a liquid flow rate less than 11.4 gallons per hour (gph) or greater than 57 gph. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria		
A. Data Representativeness	The Differential Pressure Gauge measures the pressure differential between the inlet and outlet of the scrubber.	The flow meter measures makeup water flow to the scrubber recirculation loop in gallons per minute.
B. Verification of Operation Status	Not Applicable	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge must be calibrated, operated and maintained according to the manufacturer's guidance.	The flow meter must be calibrated, operated and maintained according to the manufacturer's guidance.
D. Monitoring Frequency	Measured once daily.	Measured once daily.
E. Data Collection Procedures	The pressure differential will be recorded with date and time.	The liquid flow rate will be recorded with date and time.
F. Averaging Period	Instantaneous	Instantaneous

Compliance Plan for EP018 (Galvanizing Line SCR)

	Indicator 1
I. Indicator	Outlet NOx Concentration
Measurement Approach	NOx CEMS
II. Indicator Range	While the unit is operating, an excursion is defined as NOx emissions over 0.067 lb/MMBtu or 6.60 lbs/hr as computed from a 1 hour average. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	Measurement is being made inside the exhaust of the SCR.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The NOx CEMS will be operated in accordance with 40 CFR, Part 60, Appendix B and F.
D. Monitoring Frequency	Measured continuously.
E. Data Collection Procedures	The NOx emissions will be recorded with date and time.
F. Averaging Period	Hourly Average

**Appendix A – NSPS Subpart IIII – Compression Ignition
Emergency Generators**

<u>Location</u>	<u>HP</u>
Galvanizing Line	671
HSM Door H71	274
HSM Door H75	274

Appendix B – NSPS Subpart JJJJ – Spark Ignition Emergency Generators

<u>Location</u>	<u>HP</u>	<u>Fuel</u>
Repeater	27	Propane
Administration	107	Natural
CM Substation	113	Propane

Appendix C – MACT Subpart ZZZZ – Existing Emergency Generators

<u>Location</u>	<u>HP</u>	<u>Fuel</u>
Caster Mill	2,168	Diesel
Baghouse	2,168	Diesel
EAF Cooling Tower	2,876	Diesel
HSM Door H70	2,876	Diesel
Cold Mill	1,850	Diesel
West Firehouse Pump	267	Diesel
East Firehouse Pump	267	Diesel
North Caster Pump	42	Diesel
South Caster Pump	42	Diesel
Cold Mill Administration	200	Natural
Cold Mill Door	200	Natural
HSM Pumphouse	157	Natural
Mold Water	184	Natural
EAF Pumphouse	275	Natural