

# **STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT**

**AND PREVENTION OF SIGNIFICANT  
DETERIORATION AUTHORITY  
TO CONSTRUCT AIR EMISSIONS EQUIPMENT  
THIS CERTIFIES THAT**

SeverCorr LLC  
Golden Triangle Industrial Park  
Columbus, Mississippi  
Lowndes County

has been granted permission to construct air emissions equipment to comply with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued: March 31, 2005

Permit No.: 1680-00064

Modified: June 23, 2005 (Name/Ownership Change)

October 30, 2006

August 27, 2007

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**PART I**  
**GENERAL CONDITIONS**

- I.1. Any activities not identified in the application are not authorized by this permit.
- I.2. All air pollution control facilities shall be designed and constructed such as to allow proper operation and maintenance of the facilities.
- I.3. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.
- I.4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10.
- I.5. The construction of facilities shall be performed in such a manner as to reduce both point source and fugitive dust emissions to a minimum.
- I.6. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
  - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
  - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.
- I.7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Violation of any terms or conditions of this permit.
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts, or
  - c. A change in any condition that requires either a temporary or permanent reduction or elimination of authorized air emissions.

- I.8. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.
- I.9. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
- I.10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.
- I.11. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.
- I.12. This permit is for air pollution control purposes only.
- I.13. Approval to construct will expire should construction not begin within eighteen (18) months of the issuance of this permit, or should construction be suspended for eighteen (18) months.
- I.14. The permittee shall notify the MDEQ in writing when construction of the facility begins within fifteen (15) days of beginning actual construction.
- I.15. Upon the completion of construction or installation of an affected source, the permittee shall notify the Permit Board within thirty (30) days that construction or installation was performed in accordance with the approved plans and specifications on file with the permit board. Certification of Construction for the purposes of this permit is defined as completion of the commissioning and testing, of all of the major production lines of the Melt Shop, Hot Mill and Finishing, which allows the beginning of operations as an integrated facility.
- I.16. The Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance of the Title V Permit to Operate is due. The permittee shall submit an application for a Title V Permit to Operate no later than twelve (12) months after beginning operation. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

**PART II**  
**EMISSION POINT DESCRIPTION**

The permittee is authorized to construct air emissions equipment for the emission of air contaminants from the Steel mini-Mill Production Facility:

<b>Emission Point</b>	<b>Description</b>
<b>AA-000</b>	<b>Specialty Integrated Steel Mini-Mill Production Facility</b>
<b>AA-001</b>	<b>Scrap Handling and Processing Operations</b>
<b>AA-002 thru AA-005 and AB-002 thru AB-005</b>	<b>Meltshop Operations</b>
AA-002	Direct Evacuation Control (DEC) System with a Canopy Hood vented to a Baghouse for controlling emissions from the Meltshop.
AB-002	Direct Evacuation Control (DEC) System with a Canopy Hood vented to a Baghouse for controlling emissions from the Meltshop.
AA-003	Electric Arc Furnace with a rated design capacity of 350 tons/hr.
AB-003	Electric Arc Furnace with a rated design capacity of 350 tons/hr.
AA-004	Ladle Metallurgical- Furnace with a rated design capacity of 350 tons/hr.
AB-004	Ladle Metallurgical- Furnace with a rated design capacity of 350 tons/hr.
AA-005a	Oxygen Blown Vacuum Degassing Flare with a rated design capacity of 65.0 MMBTU/Hr.
AB-005a	Oxygen Blown Vacuum Degassing Flare with a rated design capacity of 65.0 MMBTU/Hr.
AA-005b	Vacuum Degassing Boiler with a rated design capacity of 51.0 MMBTU/Hr
AB-005b	Vacuum Degassing Boiler with a rated design capacity of 51.0 MMBTU/Hr
<b>AA-006 thru AA-010, AA-012, AB-006 thru AB-010, and AB-012</b>	<b>Casting Operations located within the Meltshop.</b>
AA-006	Three (3) natural gas-fired Ladle Preheaters with a rated design capacity each of 15.0 MMBTU/Hr.

Emission Point	Description
AB-006	Two (2) natural gas-fired Ladle Preheaters with a rated design capacity each of 15.0 MMBTU/Hr.
AA-007	One (1) natural gas-fired Ladle Dryout Heater with a rated design capacity of 15.0 MMBTU/Hr.
AB-007	One (1) natural gas-fired Ladle Dryout Heater with a rated design capacity of 15.0 MMBTU/Hr.
AA-008	Continuous Caster with a rated design capacity of 350 tons/hr.
AB-008	Continuous Caster with a rated design capacity of 350 tons/hr.
AA-009	One (1) natural gas fired Tundish Preheater with a rated design capacity of 10.0 MMBTU/Hr.
AB-009	Three (3) natural gas fired Tundish Preheaters with a rated design capacity each of 10.0 MMBTU/Hr.
AA-010	One (1) natural gas fired Tundish Dryout Heater with a rated design capacity of 10.0 MMBTU/Hr.
AB-010	One (1) natural gas fired Tundish Dryout Heater with a rated design capacity of 10.0 MMBTU/Hr.
AA-012	One (1) natural gas fired Vertical Ladle Holding Station with a rated design capacity of 11.0 MMBTU/Hr.
AB-012	One (1) natural gas fired Vertical Ladle Holding Station with a rated design capacity of 11.0 MMBTU/Hr.
<b>AA-011 and AB-011</b>	<b>Hot Mill Operations</b>
AA-011	Tunnel (Re-Heat) Furnace with a rated design capacity of 160.0 MMBTU/hr.
AB-011	Tunnel (Re-Heat) Furnace with a rated design capacity of 132.0 MMBTU/hr.
<b>AA-014 thru AA-015, AA-025, AB-015 and AB-025</b>	<b>Pickle Line/Cold Mill Operations</b>
AA-014	5-Stand Cold Mill
AA-015a	HCL Pickling Line containing four HCl Tanks.
AB-015a	HCL Pickling Line containing four HCl Tanks.
AA-015b	HCL Pickling Line Boiler with a rated design capacity of 67.0 MMBTU/Hr

Emission Point	Description
AB-015b	HCL Pickling Line Boiler with a rated design capacity of 67.0 MMBTU/Hr
AA-025	Scale Dust System
AB-025	Scale Dust System
<b>AA-016, AA-017, AB-016, and AB-017</b>	<b>Galvanizing/Annealing Operations</b>
AA-016	Eleven (11) natural gas fired Annealing Furnaces with a rated design capacity each of 6.0 MMBTU/Hr.
AB-016a	Nine (9) natural gas fired Annealing Furnaces with a rated design capacity each of 6.0 MMBTU/Hr.
AB-016b	Ten (10) natural gas fired Annealing Furnaces with a rated design capacity each of 6.0 MMBTU/Hr – Not operating units
AA-017	Caustic Cleaning Operation and Chromating Process equipped with demister.
AB-017	Caustic Cleaning Operation and Chromating Process equipped with demister.
AA-017a	Preheat Section and Radiant Section with a combined rated design capacity of 84.5 MMBTU/Hr.
AB-017a	Preheat Section and Radiant Section with a combined rated design capacity of 84.5 MMBTU/Hr.
AA-017d	Galvanizing Line Boiler with a rated design capacity of 24.5 MMBTU/Hr.
AB-017d	Galvanizing Line Boiler with a rated design capacity of 24.5 MMBTU/Hr.
<b>AA-018 thru AA-024, AA-026 and AA-027</b>	<b>Other Plant Wide Operations/Activities</b>
AA-019	Six Cooling Towers
AA-020	Plant Wide Storage Silos consisting of Two (2) 700 dscfm EAF Dust Silos, Seven (7) 700 dscfm Material Storage, and Weight Hoppers with six vents at 500 dscfm.
AA-021	Plant Wide Fugitive Emissions from Roadways.
AA-022	Five (5) Emergency Generators with a rated design capacity each of 1,500 kW.

<b>Emission Point</b>	<b>Description</b>
AA-023	Dust Handling/Transfer Operations.
AA-024	Facility Wide Miscellaneous Operations subject to APC-S-6, Section VII, Subsections A and B
AA-026	Twelve (12) 20,000 Gallon each Acid Storage Tanks.
<b>AA-018 and AA-027</b>	<b>On-Site Supplier Operations</b>
AA-018	Slag Processing and Mill Scale Handling Operations
AA-027	7.0 MMBTU/Hr Waste Boiler for the Hydrogen Plant Reformer.

**PART III**  
**EMISSION POINT SPECIFIC LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-000	PSD Construction Permit Issued	3.A.1	Steel	3,400,000 tpy
		3.A.2	NO <sub>x</sub>	1,166.0 tpy
		3.A.3	CO	3,913.2 tpy
		3.A.4	SO <sub>2</sub>	487.6 tpy
		3.A.5	VOCs	259.0 tpy
		3.A.6	PM	350.2 tpy
		3.A.7	PM10	286.2 tpy
		3.A.8	Opacity	10%
		3.A.9	HAPs	9.90 tpy Individual and 24.90 tpy Combined
AA-002 and AB-002	PSD Construction Permit Issued March 31, 2005 (AA-002) and August 27, 2007 (AB-002)	3.A.10	PM10	BACT: 0.0018 gr/dscf exiting baghouse
		3.A.11	Lead	BACT: 0.000871 lb/ton of steel produced and 0.305 lbs/hr and 0.74 tpy for each DEC System
		3.A.12	Opacity	BACT for Fugitive Emissions is the use of Roof Monitors and 40 CFR 60, Subpart AAa.
	40 CFR 60.272a	3.A.13	PM10	Compliance with Condition 3.A.10
		3.A.14	Opacity	3% exiting Baghouse
		3.A.15	Opacity	6% exiting Roof-Vents/Meltshop
AA-003 and AB-003	PSD Construction Permit Issued March 31, 2005 (AA-003) and August 27, 2007 (AB-003)	3.A.16	NO <sub>x</sub>	BACT: Use of DEC System
				0.35 lb/ton of Steel Produced and 122.5 lbs/hr and 297.5 tpy for each EAF
		3.A.17	CO	BACT: 2.0 lb/ton of Steel Produced and 700.0 lbs/hr and 1700 tpy for each EAF and Use of DEC System
		3.A.18	SO <sub>2</sub>	BACT: Use of Low Sulfur Scrap and 0.2 lb/ton of Steel Produced and 70 lbs/hr and 170 tpy for each EAF
		3.A.19	VOCs	BACT: 0.13 lb/ton of Steel Produced and 45.5 lbs/hr and 110.5 tpy for each EAF and Use of Scrap Management Plan



Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-004 and AB-004	PSD Construction Permit Issued March 31, 2005 (AA-004) and August 27, 2007 (AB-004)	3.A.20	NO <sub>x</sub>	BACT: 0.02 lb/ton of Steel Produced and 6.93 lbs/hr and 16.83 tpy for each LMF
		3.A.21	CO	BACT: 0.05 lb/ton of Steel Produced and 17.325 lbs/hr and 42.075 tpy
		3.A.22	SO <sub>2</sub>	BACT: 0.08 lb/ton of Steel Produced and 27.72 lbs/hr and 67.32 tpy for each LMF
		3.A.23	VOCs	BACT: 0.005 lb/ton of Steel Produced and 1.7325 lbs/hr and 4.2075 tpy for each LMF
AA-005a and AB-005a	PSD Construction Permit Issued March 31, 2005 (AA-005a) and August 27, 2007 (AB-005a)	3.A.24	CO	BACT: For Each Unit: 7.32 lb/heat and 10.95 tons/year for each flare.
				*Heat time is defined as approximately 40 minutes.
AA-005b AA-015b, AA-017d, AB-005b, AB-015b, and AB-017d	PSD Construction Permit Issued March 31, 2005 (AA-005b AA-015b, AA-017d) and August 27, 2007 ( AB-005b, AB-015b, AB-017d)	3.A.25	NO <sub>x</sub>	BACT: 0.08 lb/MMBTU, 4.08 lbs/hr each for Emission Points AA-005b and AB-005b, 5.36 lbs/hr each for Emission Points AA-015b and AB-015b, 1.96 lbs/hr each for Emission Points AA-017d and AB-017d, Combustion of Natural Gas Only, and Use of Low NOx Burners.
		3.A.26	CO	BACT: 0.084 lb/MMBTU, 4.284 lbs/hr each for Emission Points AA-005b and AB-005b, 5.628 lbs/hr each for Emission Points AA-015b and AB-015b, 2.058 lbs/hr each for Emission Points AA-017d and AB-017d, , Combustion of Natural Gas Only, and Use of Low NOx Burners.
		3.A.27	VOCs	BACT: Combustion of Natural Gas Only
		3.A.28	SO <sub>2</sub>	BACT: Combustion of Natural Gas Only
		3.A.29	PM10	BACT: Combustion of Natural Gas Only
AA-005b AA-015b, AB-005b, AB-015b, AA-017d and AB-017d	40 CFR 60, Subparts Dc and A	3.A.30	Applicability	Applicability
				Limited Requirements due to natural gas combustion only.

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-006, AA-007, AA-009, AA-010, AA-012, AA-016, AB-006, AB-007, AB-009, AB-010, AB-012, and AB-016	PSD Construction Permit Issued March 31, 2005 (AA-006, AA-007, AA-009, AA-010, AA-012, AA-016) and August 27, 2007 (AB-006, AB-007, AB-009, AB-010, AB-012, AB-016)	3.A.31	NO <sub>x</sub>	BACT: 0.1 lb/MMBTU, 4.5 lbs/hr for Emission Point AA-006, 3.0 lbs/hr each for Emission Point AB-006 and AB-009, 1.5 lbs/hr each for Emission Points AA-007 and AB-007, 1.0 lbs/hr each for Emission Points AA-009, AA-010, and AB-010, 1.1 lbs/hr each for Emission Points AA-012 and AB-012, 6.6 lbs/hr for Emission Point AA-016, 5.4 lbs/hr for Emission Point AB-016, and combusting Natural Gas only
		3.A.26	CO	BACT: 0.084 lb/MMBTU, 3.78 lbs/hr for Emission Point AA-006, 2.52 lbs/hr each for Emission Point AB-006 and AB-009, 1.26 lbs/hr each for Emission Points AA-007 and AB-007, 0.84 lbs/hr each for Emission Points AA-009, AA-010, and AB-010, 0.924 lbs/hr each for Emission Points AA-012 and AB-012, 5.544 lbs/hr for Emission Point AA-016, 4.536 lbs/hr for Emission Point AB-016, and combusting Natural Gas only
		3.A.27	SO <sub>2</sub>	BACT: Combustion of Natural Gas Only
		3.A.28	PM10	BACT: Combustion of Natural Gas Only
		3.A.29	VOCs	BACT: Combustion of Natural Gas Only
AA-011 and AB-011	PSD Construction Permit Issued March 31, 2005 (AA-011) and August 27, 2007 (AB-011)	3.A.31	NO <sub>x</sub>	BACT: 0.1 lb/MMBTU, 16.0 lbs/hr for Emission Point AA-011, 13.2 lb/hr for Emission Point AB-011, Combustion of Natural Gas Only, and low NOx burners.
AA-011 and AB-011	PSD Construction Permit Issued March 31, 2005 (AA-011) and August 27, 2007 (AB-011)	3.A.32	CO	BACT: 0.066 lb/MMBTU, 10.56 lbs/hr for Emission Point AA-011, 8.712 lb/hr for Emission Point AB-011, Combustion of Natural Gas Only, and Use of Low NOx Burners with Good Combustion Practices.
		3.A.28	SO <sub>2</sub>	BACT: Combustion of Natural Gas Only
		3.A.29	PM10	BACT: Combustion of Natural Gas Only
		3.A.33	VOCs	BACT: 0.006 lb/MMBTU, 0.96 lbs/hr for Emission Point AA-011, 0.792 lb/hr for Emission Point AB-011, Combustion of Natural Gas Only, and Use of Low NOx Burners with Good Combustion Practices.
		3.A.34	H2SO4	Combustion of Natural Gas

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-014	PSD Construction Permit Issued March 31, 2005	3.A.35	PM10	Application of a Mist Eliminator
AA-015a and AB-015a	PSD Construction Permit Issued March 31, 2005 (AA-015a) and August 27, 2007 (AB-015a)	3.A.36	PM10	BACT: Wet Scrubber followed by Mist Eliminator.
		3.A.37	HCl	BACT: Wet Scrubber followed by Mist Eliminator.
				18 ppmv
AA-017a and AB-017a	PSD Construction Permit Issued March 31, 2005 (AA-015b and August 27, 2007 (AB-015b)	3.A.38	NO <sub>x</sub>	BACT: 0.15 lb/MMBTU heat input, 12.68 lbs/hr for each Emission Point, Combustion of Natural Gas Only, and Use of Low NO <sub>x</sub> Burners.
		3.A.26	CO	BACT: 0.084 lb/MMBTU heat input, 7.09 lbs/hr for each Emission Point, Combustion of Natural Gas Only, and Use of Low NO <sub>x</sub> Burners.
		3.A.27	SO <sub>2</sub>	BACT: Combustion of Natural Gas Only
		3.A.28	PM10	BACT: Combustion of Natural Gas Only
		3.A.29	VOCs	BACT: Combustion of Natural Gas Only
AA-018	PSD Construction Permit Issued March 31, 2005	3.A.39	PM/PM10	BACT for Fugitive Emissions is limiting the drop heights and the application of water
AA-019	PSD Construction Permit Issued March 31, 2005	3.A.40	PM/PM10	BACT: Application of a Drift Eliminator
AA-020	PSD Construction Permit Issued March 31, 2005	3.A.41	PM/PM10	BACT: 0.01 gr/dscf utilizing bin vent filters
AA-021	PSD Construction Permit Issued March 31, 2005	3.A.42	PM/PM10	BACT: Use of Wetting Agents
AA-023	40 CFR 60.272a	3.A.43	Opacity	10% from the Dust Handling/Transfer Operations
AA-002, AA-003, AA-023, AB-002, and AB-003	40 CFR 60, Subpart AAa and Gen. Provisions	3.A.44	Applicable	Applicability

- 3.A.1 For the Entire Facility, the permittee shall limit the annual steel production to no than 3,400,000 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.2 For the Entire Facility, the permittee shall limit Nitrogen Oxide emissions to no more than 1166.0 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.3 For the Entire Facility, the permittee shall limit Carbon Monoxide emissions to no more than 3913.2 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.4 For the Entire Facility, the permittee shall limit Sulfur Dioxide emissions to no more than 487.6 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.5 For the Entire Facility, the permittee shall limit Volatile Organic Compound emissions to no more than 259.0 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.6 For the Entire Facility, the permittee shall limit Particulate Matter emissions to no more than 350.2 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.7 For the Entire Facility, the permittee shall limit Particulate Matter-10 emissions to no more than 286.2 tons per year as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.8 For the Entire Facility, the permittee shall limit Opacity from any emission source to no more than 10% at any time as determined by EPA Reference Method 9. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.9 For the Entire Facility, the permittee shall limit Hazardous Air Pollutants to no more than 9.9 tons per year for each Individual Hazardous Air Pollutant (HAP) and no more than 24.9 tons per year for combined HAPs, as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued August 27, 2007)
- 3.A.10 For Emission Point AA-002 and AB-002, the permittee shall limit emissions of Particulate Matter-10 to no more than 0.0018 grains per dry standard cubic feet utilizing the Direct Evacuation Control System and Fabric Filter Baghouse (BACT for PM10). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.11 For Emission Point AA-002 and AB-002, the permittee shall limit the total emissions of Lead from each Direct Evacuation Control System with Fabric Filter Baghouse to no

more than 0.000871 pounds per ton of steel produced, 0.305 pounds per hour, and 0.74 tons per year as determined for each consecutive 12-month period. (BACT for Lead). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)

- 3.A.12 For Emission Point AA-002 and AB-002, the permittee shall limit Fugitive Emission by the use of Roof Monitors and 40 CFR 60, Subpart AAa (BACT for Fugitive Emissions). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.13 For Emission Point AA-002 and AB-002, the permittee shall determine compliance with the NSPS - Subpart AAa Emission Limitations by determining compliance with Condition 3.A.10 of the permit herein and utilize the Direct Evacuation Control System and Fabric Filter Baghouse. (Ref. 40 CFR 60.272a)
- 3.A.14 For Emission Point AA-002 and AB-002, the permittee shall limit the Opacity to no more than 3% at any time utilizing the Direct Evacuation Control System and Fabric Filter Baghouse. (Ref. 40 CFR 60.272a)
- 3.A.15 For Emission Point AA-002 and AB-002, the permittee shall limit the Opacity to no more than 6% at any time exiting the Roof-Vents/Meltshop. (Ref. 40 CFR 60.272a)
- 3.A.16 For Emission Points AA-003 and AB-003, the permittee shall limit the total emissions of Nitrogen Oxide from each EAF to no more than 0.35 pounds per ton of Steel Produced, 122.5 pounds per hour, and 297.5 tons per year as determined for each consecutive 12-month period, utilizing the DEC System. (BACT for NO<sub>x</sub> is Use of the DEC System). (Ref. PSD Construction Permit Issued on March 31, 2005 and )
- 3.A.17 For Emission Points AA-003 and AB-003, the permittee shall limit the total emissions of Carbon Monoxide from each EAF to no more than 2.0 pound per ton of Steel Produced, 700.0 pounds per hour, 1700 tons per year as determined for each consecutive 12-month period, utilizing the DEC System (BACT for CO). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.18 For Emission Points AA-003 and AB-003, the permittee shall limit the total emissions of Sulfur Oxides from each EAF to no more than 0.2 pounds per ton of Steel Produced, 70.0 pounds per hour, 170.0 tons per year as determined for each consecutive 12-month period, and Use Low Sulfur Scrap (BACT for SO<sub>2</sub>). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.19 For Emission Points AA-003 and AB-003, the permittee shall limit the total emissions of Volatile Organic Compounds from each EAF to no more than 0.13 pound per ton of Steel Produced, 45.5 pounds per hour, and 110.5 tons per year as determined for each consecutive 12-month period, and develop and implement a Scrap Management Plan. (BACT for VOCs). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)

- 3.A.20 For Emission Points AA-004 and AB-004, the permittee shall limit the total emissions of Nitrogen Oxides from each LMF to no more than 0.02 pounds per ton of Steel Produced, 6.93 pounds per hour, and 16.83 tons per year as determined for each consecutive 12-month period. (BACT for NO<sub>x</sub>). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.21 For Emission Points AA-004 and AB-004, the permittee shall limit the total emissions of Carbon Monoxide from each LMF to no more than 0.05 pound per ton of Steel Produced and 17.325 pounds per hour, and 42.075 tons per year as determined for each consecutive 12-month period (BACT for CO). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.22 For Emission Points AA-004 and AB-004, the permittee shall limit the total emissions of Sulfur Dioxides from each LMF to no more than 0.08 pound per ton of Steel Produced, 27.72 pounds per hour, and 67.32 tons per year as determined for each consecutive 12-month period (BACT for SO<sub>2</sub>). (Ref. PSD Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.23 For Emission Points AA-004 and AB-004, the permittee shall limit the total emissions of Volatile Organic Compounds from each LMF to no more than 0.005 pound per ton of Steel Produced and 1.7325 pounds per hour, and 4.2075 tons per year as determined for each consecutive 12-month period (BACT for VOCs). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.24 For Emission Point AA-005a and AB-005a, the permittee shall limit emissions of Carbon Monoxide to no more than 7.32 pounds per heat and 10.95 tons per year as determined for each consecutive 12-month period for each flare as determined for each consecutive 12-month period (BACT for CO). The heat time is defined as approximately 40 minutes. (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.25 For Emission Point AA-005b, AA-015b, AA-017d, AB-005b, AB-015b, and AB-017d, the permittee shall limit emissions of Nitrogen Oxides to no more than 0.08 pound per Million British Thermal Units (lb/MMBTU) heat input, combust Natural Gas only and utilize low NO<sub>x</sub> burners. For Emission Points AA-005b and AB-005b, the permittee shall limit emissions of NO<sub>x</sub> from each boiler to no more than 4.08 pounds per hour. For Emission Points AA-015b and AB-015b, the permittee shall limit emissions of NO<sub>x</sub> from each boiler to no more than 5.36 pounds per hour. For Emission Points AA-017d and AB-017d, the permittee shall limit emissions of NO<sub>x</sub> from each boiler to no more than 1.96 pounds per hour. (BACT for NO<sub>x</sub>)  
(Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.26 For Emission Point AA-005b, AA-006, AA-007, AA-009, AA-010, AA-012, AA-015b, AA-016, AA-017d, AB-005b, AB-006, AB-007, AB-009, AB-010, AB-012, AB-015b, AB-016, AB-017b, and AB-017d, the permittee shall limit emissions of Carbon Monoxide to no more than 0.084 lb/MMBTU heat input, combust Natural Gas only, and

utilize low NO<sub>x</sub> burners. For Emission Points AA-005b and AB-005b, the permittee shall limit emissions of CO from each boiler to no more than 4.284 pounds per hour. For Emission Point AA-006, the permittee shall limit emissions of CO to no more than 3.78 pounds per hour. For Emission Points AB-006 and AB-009, the permittee shall limit emissions of CO from each unit to no more than 2.52 pounds per hour. For Emission Points AA-007 and AB-007, the permittee shall limit emissions of CO from each unit to no more than 1.26 pounds per hour. For Emission Points AA-009, AA-010, and AB-010, the permittee shall limit emissions of CO from each unit to no more than 0.84 pounds per hour. For Emission Points AA-012 and AB-012, the permittee shall limit emissions of CO from each unit to no more than 0.924 pounds per hour. For Emission Points AA-015b and AB-015b, the permittee shall limit emissions of CO from each boiler to no more than 5.628 pounds per hour. For Emission Point AA-016, the permittee shall limit emissions of CO to no more than 5.544 pounds per hour. For Emission Point AB-016, the permittee shall limit emissions of CO to no more than 4.536 pounds per hour. For Emission Points AA-017a and AB-017a, the permittee shall limit emission of CO from each unit to no more than 7.09 pounds per hour. For Emission Points AA-017d and AB-017d, the permittee shall limit emissions of CO from each boiler to no more than 2.058 pounds per hour. (BACT for CO) (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)

- 3.A.27 For Emission Point AA-005b, AA-006, AA-007, AA-009, AA-010, AA-012, AA-015b, AA-016, AA-017a, AA-017d, AB-005b, AB-006, AB-007, AB-009, AB-010, AB-012, AB-015b, AB-016, AB-017a, and AB-017d, the permittee shall limit emissions of Volatile Organic Compounds by combusting Natural Gas only.  
(BACT for VOCs is Combustion of Natural Gas Only)  
(Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.28 For Emission Point AA-005b, AA-006, AA-007, AA-009, AA-010, AA-011, AA-012, AA-015b, AA-016, AA-017a, AA-017d, AB-005b, AB-006, AB-007, AB-009, AB-010, AB-011, AB-012, AB-015b, AB-016, AB-017a, and AB-017d, the permittee shall limit emissions of Sulfur Dioxide by combusting Natural Gas only (BACT for VOCs).  
(Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.29 For Emission Point AA-005b, AA-006, AA-007, AA-009, AA-010, AA-011, AA-012, AA-015b, AA-016, AA-017a, AA-017d, AB-005b, AB-006, AB-007, AB-009, AB-010, AB-011, AB-012, AB-015b, AB-016, AB-017a, and AB-017d, the permittee shall limit emissions of Particulate Matter 10 by combusting Natural Gas only (BACT for PM<sub>10</sub>).  
(Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.30 For Emission Points AA-005b, AA-015b, AA-017d, AB-005b, AB-015b, and AB-017d the permittee is subject to 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial Steam Generating Units, specifically 40 CFR 60.40c(a) and Subpart A-General Provisions. The permittee has limited requirements and is not required to comply with any Emission Limitations, Performance Testing, Monitoring, and Recording of Subpart Dc since the permittee is limited to combustion of natural gas only as BACT Limitations for SO<sub>2</sub> and PM. (Ref. 40 CFR 60, Subpart Dc)

- 3.A.31 For Emission Points AA-006, AA-007, AA-009, AA-010, AA-011, AA-012, AA-016, AB-006, AB-007, AB-009, AB-010, AB-011, AB-012, and AB-016, the permittee shall limit emissions of Nitrogen Oxides to no more than 0.1 lb/MMBTU heat input, combust Natural Gas only and utilize low NOx burners. For Emission Point AA-006, the permittee shall limit emissions of NOx to no more than 4.5 pounds per hour. For Emission Points AB-006 and AB-009, the permittee shall limit emissions of NOx from each unit to no more than 3.0 pounds per hour. For Emission Points AA-007 and AB-007, the permittee shall limit emissions of NOx from each unit to no more than 1.5 pounds per hour. For Emission Points AA-009, AA-010, and AB-010, the permittee shall limit emissions of NOx from each unit to no more than 1.0 pounds per hour. For Emission Point AA-011, the permittee shall limit emissions of NOx to no more than 16.0 lbs/hr. For Emission Point AA-012, the permittee shall limit emissions of NOx to no more than 0.1 pounds per hour. For Emissions Point AB-011, the permittee shall limit emissions of NOx to no more than 13.2 pounds per hour. For Emission Points AA-012 and AB-012, the permittee shall limit emissions of NOx from each unit to no more than 1.1 pounds per hour. For Emission Point AA-016, the permittee shall limit emissions of NOx no more than 6.6 pounds per hour. For Emission Point AB-016, the permittee shall limit emissions of NOx to no more than 5.4 pounds per hour. (BACT for NOx). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.32 For Emission Points AA-011 and AB-011, the permittee shall limit emissions of Carbon Monoxide to no more than 0.066 lb/MMBTU heat input, combust Natural Gas only, and utilize low NOx burners. For Emission Point AA-011, the permittee shall limit emissions of CO to no more than 10.56 pounds per hour. For Emission Point AB-011, the permittee shall limit emissions of CO to no more than 8.712 pounds per hour. (BACT for CO). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.33 For Emission Points AA-011 and AB-011, the permittee shall limit emissions of Volatile Organic Compounds (VOCs) to no more than 0.006 lb/MMBTU heat input, combust Natural Gas only, and utilize low NOx burners. For Emission Point AA-011, the permittee shall limit emissions of VOCs to no more than 0.96 pounds per hour. For Emission Point AB-011, the permittee shall limit emissions of VOCs to no more than 0.792 pounds per hour. (BACT for VOCs) (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.34 For Emission Points AA-011 and AB-011, the permittee shall limit emissions of Sulfur Acid Mist by combusting Natural Gas only. (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.35 For Emission Point AA-014, the permittee shall limit emissions of Particulate Matter 10 by utilizing a Mist Eliminator. (Ref. PSD Construction Permit Issued on March 31, 2005)



- 3.A.36 For Emission Point AA-015a and AB-015a, the permittee shall limit emissions of Particulate Matter 10 utilizing a Wet Scrubber followed by a Mist Eliminator (BACT for PM10). (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.37 For Emission Point AA-015a and AB-015a, the permittee shall limit emissions of Hydrochloric Acid Mist to 18 ppmv utilizing a Wet Scrubber followed by a Mist Eliminator. (BACT for HCl is the Use of a Wet Scrubber followed by a Mist Eliminator) (Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.38 For Emission Points AA-017a and AB-017a, the permittee shall limit emissions of Nitrogen Oxides to no more than 0.15 lb/MMBTU heat input, combust Natural Gas only, and utilize low NOx burners. For Emission Points AA-017a and AB-017a, the permittee shall limit emissions of NOx from each unit to no more than 12.68 pounds per hour. (BACT for NOx)  
(Ref. PSD Construction Permit Issued on March 31, 2005 and August 27, 2007)
- 3.A.39 For Emission Point AA-018, the permittee shall limit Fugitive Emissions of Particulate Matter/Particulate Matter 10 by limiting the drop heights and application of water. (BACT for PM/PM10)  
(Ref. PSD Construction Permit Issued on March 31, 2005)
- 3.A.40 For Emission Points AA-019, the permittee shall limit emissions of Particulate Matter/Particulate Matter 10 by Application of a Drift Eliminator (BACT for PM/PM10).  
(Ref. PSD Construction Permit Issued on March 31, 2005)
- 3.A.41 For Emission Point AA-020, the permittee shall limit emissions of Particulate Matter/Particulate Matter 10 to no more than 0.01 grains per dry standard cubic foot utilizing bin vent filters (BACT for PM/PM10).  
(Ref. PSD Construction Permit Issued on March 31, 2005)
- 3.A.42 For Emission Point AA-021, the permittee shall limit Particulate Matter by use of Wetting Agents (BACT for PM/PM10).  
(Ref. PSD Construction Permit Issued on March 31, 2005)
- 3.A.43 For Emission Point AA-023, the permittee shall limit Opacity to 10% at any time as determined by 40 CFR 60, Subpart AAa. (Ref. 40 CFR 60.272a)
- 3.A.44 For Emission Points AA-002, AA-003, AA-023, AB-002, and AB-003, the permittee is subject to 40 CFR 60, Subpart AAa - Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed after August 7, 1983 and Subpart A-General Provisions)

**PART IV**  
**EMISSION POINT SPECIFIC COMPLIANCE/PERFORMANCE REQUIREMENTS**

Emission Point	Pollutant/ Parameter Monitored	Compliance Requirement	Condition Number	Applicable Requirement
AA-003 and AB-003	NOx	Installation and Operation of CEMS Deadline (Continuous Emission Monitoring System)	4.A.1	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
	SO2			
	VOC			
AA-003, AB-003 AA-004, and AB-004	NOx	Annual Stack/Performance Testing for demonstrating compliance with BACT Limits	4.A.1	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
	SO2			
	VOC			
AA-002 and AB-002	PM10	Annual Stack/Performance Testing for demonstrating compliance with BACT Limits	4.A.2	PSD Construction Permit Issued March 31, 2005 and August 27, 2007 and 40 CFR 60.272a
	Lead			
AA-005b, AA-015b, AA-017d, AB-005b, AB-015b, and AB-017d	NOx	Once Every Five Years Stack/Performance Testing for demonstrating compliance with BACT Limits	4.A.3	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
AA-005b, AB-005b, AA-006, AB-006, AA-007, AB-007, AA-009, AB-009, AA-010, AB-010, AA-011, AB-011, AA-012, AB-012, AA-015b, AB-015b, AA-016, AB-016, AA-017a, AB-017a, AA-017d, and AB-017d	NOx	Utilize Good Combustion Practices and Implement Maintenance Guidelines for demonstrating compliance with BACT	4.A.4	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
	PM10			
	VOCs			
AA-005a and AB-005a	CO	Utilize Good Combustion Practices and Implement Maintenance Guidelines for demonstrating compliance with BACT	4.A.5	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-018, AA-019, AA-020, and AA-021	PM/PM10	Utilize Good Combustion Practices and Implement Maintenance Guidelines for demonstrating compliance with BACT	4.A.6	PSD Construction Permit Issued March 31, 2005 and August 27, 2007

Emission Point	Pollutant/ Parameter Monitored	Compliance Requirement	Condition Number	Applicable Requirement
AA-015a and AB-015a	PM10	Utilize Good Combustion Practices and Implement Maintenance Guidelines for demonstrating compliance with BACT	4.A.7	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	HCl	Once Every Five Years Stack/Performance Testing for demonstrating compliance with BACT Limits	4.A.8	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Entire Facility	NOx	Determine the Emission Rate for each consecutive 12-month period.	4.A.9	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
	SO2			
	VOCs			
	PM			
	PM10			
	Individual HAP			
	Total HAPs			
Entire Facility	Steel	Determine the Production for each consecutive 12-month period.	4.A.10	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-005b, AB-005b, AA-006, AB-006, AA-007, AB-007, AA-009, AB-009, AA-010, AB-010, AA-011, AB-011, AA-012, AB-012, AA-015b, AB-015b, AA-016, AB-016, AA-017a, and AB-017a	SO2	Determine Emission Rate utilizing Natural Gas Usage	4.A.11	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	PM10			
AA-017d and AB-017d	PM10	Determine Emission Rate utilizing Natural Gas Usage	4.A.12	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-002, AB-002, AA-003, AB-003, and AA-023	Emissions Monitoring	Standards of Performance	4.A.13	40 CFR 60.273a and 60.274a

Emission Point	Pollutant/ Parameter Monitored	Compliance Requirement	Condition Number	Applicable Requirement
AA-002, AB-002, AA-003, and AB-003	Performance Test	Performance Testing Requirements	4.A.14	40 CFR 60.275a
Facility Wide	Opacity	Demonstrate Compliance utilizing EPA Method 22 or EPA Method 9	4.A.15	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Facility Wide	Pre-Test Conference	30 days prior to performance testing any emission point	4.A.16	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Facility Wide	Control Equipment	Regular Maintenance shall be maintained and kept in log form.	4.A.17	PSD Construction Permit Issued March 31, 2005 and August 27, 2007

- 4.A.1 For Emission Points AA-003, AB-003, AA-004, and AB-004, the permittee shall perform annual stack/performance testing for a combined BACT Limit at Emission Point AA-002 and AB-002, for demonstrating compliance with the individual NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOC, BACT Limits at AA-003, AB-003, AA-004, and AB-004, specifically Conditions 3.A.16 thru 3.A.19 and 3.A.20 thru 3.A.23, respectively of the federally enforceable permit herein. The permittee shall stack test for NO<sub>x</sub> and CO simultaneously.

The said Performance Test(s) shall be performed within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial start-up. The permittee shall utilize the following Test Methods or an alternative EPA approved test method:

- (1) For NO<sub>x</sub>, the permittee shall utilize EPA Reference Method 7E.
- (2) For CO, the permittee shall utilize EPA Reference Method 10
- (2) For SO<sub>2</sub>, the permittee shall utilize EPA Reference Method 6C.
- (3) For VOCs, the permittee shall utilize EPA Reference Method 25A.

During the performance test, the permittee shall monitor the following:

- (a) Charge weights and materials, tap weights, and materials
- (b) Heat times, including start and stop times and a log of process operations, including periods of no operation during testing.
- (c) Control device operation log; and
- (d) Continuous Monitor or Reference Method 9 data.

For Emission Points AA-003 and AB-003, the permittee shall install and operate a Continuous Emissions Monitoring System (CEMS) for monitoring the emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs, according to the manufacturers design, specifications, and recommendations, of which a protocol shall developed by the permittee and approved by the MDEQ prior to operation. The CEMS shall be installed no later than the aforementioned Performance Test for AB-003 and no later than three years from start of construction for AB-003.. Upon operation of the CEMS, the permittee will no longer be required to perform annual stack/performance testing, but rather be required to perform stack/performance testing once every five years, but not to exceed more than once during the permit term of the Title V Permit to Operate. Also upon operation of the CEMS, the permittee will no longer be required to provide MDEQ with updates/changes, nor maintain monitoring, recording, or reporting requirements of the Scrap Management Plans.  
(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.2. For Emission Points AA-002 and AB-002, the permittee shall perform annual stack/performance testing for demonstrating compliance with the individual PM<sub>10</sub> and Lead Limits, specifically Conditions 3.A.10, 3.A.13, and 3.A.11 of the federally enforceable permit herein, and also PM for demonstrating compliance with the facility wide PM emission limitation.

The said Performance Test(s) shall be performed within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial

start-up. The permittee shall utilize the following Test Method or an EPA approved test method:

(1) For PM, PM10 and/or Lead, the permittee shall utilize EPA Reference Method 5 or 5D.

During the performance test, the permittee shall monitor the following:

- (a) Charge weights and materials, tap weights, and materials
  - (b) Heat times, including start and stop times and a log of process operations, including periods of no operation during testing.
  - (c) Control device operation log; and
  - (d) Continuous Monitor or Reference Method 9 data.
- (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.3 For Emission Points AA-005b, AB-005b, AA-015b, AB-015b, AA-017d, and AB-017d, the permittee shall perform a stack/performance test once every five years for demonstrating compliance with the NO<sub>x</sub> and CO BACT Limits, specifically Conditions 3.A.25, and 3.A.26, respectively, of the federally enforceable permit herein. The permittee shall stack test for NO<sub>x</sub> and CO simultaneously.

The said Performance Test(s) shall be performed within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial start-up. The permittee shall utilize the following Test Methods or an alternative EPA approved test method:

- (1) For NO<sub>x</sub>, and CO, the permittee shall utilize the Test Methods specified in Condition 4.A.1 of the federally enforceable permit herein.

(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.4 For Emission Points AA-005b, AB-005b, AA-006, AB-006, AA-007, AB-007, AA-009, AB-009, AA-010, AB-010, AA-011, AB-011, AA-012, AB-012, AA-015b, AB-015b, AA-016, AB-016, AA-017a, AB-017a, AA-017d and AB-017d, the permittee shall utilize good combustion practices and implement a program to maintain the systems per the manufacturer's maintenance guidelines for demonstrating compliance with the individual BACT Limits for NO<sub>x</sub>, CO, PM10, and VOCs, specifically Conditions 3.A.25, 3.A.26, 3.A.27, 3.A.29, 3.A.31, 3.A.32, and 3.A.33, of the federally enforceable permit herein.  
(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.5 For Emission Points AA-005a and AB-005a, the permittee shall utilize good combustion practices and implement a program to maintain the systems per the manufacturer's maintenance guidelines for demonstrating compliance with the individual BACT Limit for CO, specifically Condition 3.A.24 of the federally enforceable permit herein.  
(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.6 For Emission Points AA-018, AA-019, AA-020, and AA-021, the permittee shall implement a program to maintain the systems per the manufacturer's maintenance guidelines for demonstrating compliance with the individual BACT Limits for PM/PM10, specifically Conditions 3.A.39, 3.A.40, 3.A.41, and 3.A.42 of the federally enforceable permit herein.

(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.7 For Emission Points AA-015a and AB-015a, the permittee shall implement a program to maintain the systems per the manufacturer's maintenance guidelines for demonstrating compliance with the individual BACT Limit for PM10, specifically Condition 3.A.36 of the federally enforceable permit herein.

(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.8 For Emission Points AA-015a, and AB-015a, the permittee shall perform stack/performance test once every five years for demonstrating compliance with the HCl BACT Limits, specifically Condition 3.A.37, respectively, of the federally enforceable permit herein.

The said Performance Test(s) shall be performed within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial start-up. The permittee shall utilize the following Test Methods or an alternative EPA approved test method:

For HCL, the permittee shall utilize EPA Reference Method 26A.

(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.9 For the Entire Facility, the permittee shall determine the Facility Wide NO<sub>x</sub>, CO, SO<sub>2</sub>, VOCs, PM, PM10, Individual HAP, and Combined HAPs Emission Rate as determined for each consecutive 12-month period by utilizing data obtained from Stack/Performance Testing, Natural Gas Usage Records, and any other data necessary to demonstrate compliance with Condition 3.A.2, 3.A.3, 3.A.4, 3.A.5, 3.A.6, 3.A.7, and 3.A.9, respectively, of the federally enforceable permit herein. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.10 For the entire Facility, the permittee shall determine the Facility Wide Steel Production by utilizing data obtained from Purchasing, Processing, and Production Records, and any other data necessary to determine the Facility Wide Production Rate as determined for each consecutive 12-month period. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.11 For Emission Points AA-005b, AB-005b, AA-006, AB-006, AA-007, AB-007, AA-009, AB-009, AA-010, AB-010, AA-011, AB-011, AA-012, AB-012, AA-015b, AB-015b, AA-016, AB-016, AA-017a, and AB-017a, the permittee shall demonstrate compliance with the SO<sub>2</sub> and PM10 Emission Rates, specifically Conditions 3.A.28 and 3.A.29, utilizing the Natural Gas Usage Rates. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.12 For Emission Points AA-017d, and AB-017d, the permittee shall demonstrate compliance with the PM10 Emission Rate, specifically Condition 3.A.29, utilizing the Natural Gas Usage Rates. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 4.A.13 For Emission Points AA-002, AB-002, AA-003, AB-003, and AA-023, the permittee shall comply with the Standards of Performance for Emissions Monitoring as described by 40 CFR 60.273a and 60.274a. (Ref. 40 CFR 60, Subpart AAa)
- 4.A.14 For Emission Points AA-002, AB-002, AA-003, and AB-003, the permittee shall comply with the Performance Testing described in CFR 60.275a. The permittee shall utilize the EPA Test Methods specified in Condition 4.A.1 of the federally enforceable permit herein. The said Performance Test(s) shall be performed within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial start-up.

During the performance test, the permittee shall monitor the following:

- (a) Charge weights and materials, tap weights, and materials
- (b) Heat times, including start and stop times and a log of process operations, including periods of no operation during testing.
- (c) Control device operation log; and
- (d) Continuous Monitor or Reference Method 9 data.

(Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007 and Ref. 40 CFR 60, Subpart AAa)

- 4.A.15 For the Entire Facility, the permittee shall demonstrate compliance with the 10% opacity limit within 60 days of achieving the maximum production rate at which the permittee will operate, but not later than 180 days of initial start-up. The permittee shall utilize EPA Test Method 22. If positive opacity for a specific emission point is noted during the EPA Method 22 observation, then EPA Test Method 9 will be performed for that emission point and submittal of a test report. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 4.A.16 For all Emission Points required to perform Performance/Stack Testing, a pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to MDEQ. Also, MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 4.A.17 For All Emission Points, regular maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. Records of this maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)



**PART V**  
**EMISSION POINT SPECIFIC RECORDKEEPING/REPORTING REQUIREMENTS**

Emission Point	Pollutant/ Parameter Monitored	Recordkeeping/Reporting Requirement	Condition Number	Applicable Requirement
Entire Facility	Emission Limitations	Maintain all records necessary to demonstrate compliance	5.A.1	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Combustion Equipment	Natural Gas	Usage on a Monthly Basis	5.A.2	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-002, AB-002, AA-003, AB-003, and AA-023	Subpart AAa Requirements	Recordkeeping	5.A.3	40 CFR 60.276a and PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-005b, AB- 005b, AA-015b, AB-0115b, AA- 017d, and AB-017d	Subpart Dc Requirements	Recordkeeping	5.A.4	40 CFR 60.48c and PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Entire Facility	Performance Testing	Submit results no later than 60 days from actual test.	5.A.5	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-000	NOx	Semi-Annual Report of Facility Wide Emission Rate in tons per year as determined for each consecutive 12- month period	5.A.6	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	CO			
	SO2			
	VOCs			
	PM			
	PM10			
	Individual HAP			
	Total HAPs			
	NOx	Semi-Annual Report of Calculated short term BACT Limits		
	CO			
	SO2			

Emission Point	Pollutant/ Parameter Monitored	Recordkeeping/Reporting Requirement	Condition Number	Applicable Requirement
AA-000	PM	Semi-Annual Report of Calculated short term BACT Limits	5.A.6	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
	PM10			
	VOC			
	Lead			
	HCl			
	Natural Gas	Semi-Annual Report of Usage Rate		
	Steel	Semi-Annual Report of Production		
Entire Facility	Deviations	Reported with 5 days from the time the deviation began	5.A.7	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-002, AB-002, AA-003, AB-003, and AA-023	40 CFR 60, Subpart AAa	Reporting Requirements	5.A.8	40 CFR 60.276a and PSD Construction Permit Issued March 31, 2005 and August 27, 2007
AA-005b, AB- 005b, AA-015a, AB-015b, and AA-017d	40 CFR 60, Subpart Dc		5.A.9	40 CFR 60.48c(a) and PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Entire Facility	Certification of Construction	Report in writing the effective date of start-up no later than 10 days following commencement	5.A.10	PSD Construction Permit Issued March 31, 2005 and August 27, 2007
Entire Facility	Other	Un-authorization by Permit	5.A.11	MDEQ Regulations, APC- S-2

- 5.A.1 For the Entire Facility, the permittee shall keep all records necessary to demonstrate compliance with the Emission Limitations of PART III of the Federally Enforceable Permit Herein (specifically titled PART III EMISSION LIMITATIONS) and the Emission Point specific BACT Limits for NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub>, VOC, Lead, and HCl. These records shall be maintained for five years including the data obtained from PART IV COMPLIANCE REQUIREMENTS AND/OR PERFORMANCE TESTING, as well as any other data necessary to demonstrate compliance and not expressed herein. These records shall contain the monthly and twelve consecutive month emission rates for the Emission Point specific BACT Emission Limits and the Facility Wide Emission Limitations. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 5.A.2 For all combustion equipment, the permittee shall keep a record of natural gas usage rates on a monthly basis. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 5.A.3 For Emission Points AA-002, AB-002, AA-003, AB-003, and AA-023, the permittee shall comply with the recordkeeping requirements as described in 40 CFR 60.276a, Subpart AAa. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007 and 40 CFR 60, Subpart AAa)
- 5.A.4 For Emission Points AA-005b, AB-005b, AA-015b, AB-015b, AA-017d, and AB-017d, the permittee shall comply with the recordkeeping requirements as described in 40 CFR 60.48c, Subpart Dc. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007 and 40 CFR 60, Subpart Dc)
- 5.A.5 For all Emission Points required to perform Performance Testing, the permittee shall submit the results of the Performance Testing no later than 60 days of the actual performance test. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 5.A.6 For Emission Point AA-000, the permittee shall submit semi-annual reports by July 31st and January 31st for the preceding six-month period containing the following;
- (1) The Facility Wide Emission Rates in tons per year, as determined for each consecutive 12-month period, for demonstrating compliance with Conditions 3.A.1, 3.A.2, 3.A.3, 3.A.4, 3.A.5, 3.A.6, 3.A.7, 3.A.8, and 3.A.9.
  - (2) The calculated short term BACT Limits for NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub>, VOC, Lead, and HCl Emission Rates utilizing the requirements of PART III COMPLIANCE REQUIREMENTS AND PERFORMANCE TESTING
  - (3) The natural gas usage rates.
  - (4) The Facility Wide Steel Production in tons/year based on a 12-month rolling total.
- (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 5.A.7 Any deviation(s) from the Federally Enforceable Permit herein, including those attributable to upsets, shall be reported within 5 days from the time the deviation began. This report

shall also include the probable cause of such deviation(s) and any corrective actions or preventative measures taken. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)

- 5.A.8 For Emission Points AA-002, AB-002, AA-003, AB-003, and AA-023, the permittee shall comply with the reporting requirements as described in 40 CFR 60.276a, Subpart AAa. (Ref. 40 CFR 60, Subpart AAa)
- 5.A.9 For Emission Points AA-005b, AB-005b, AA-015b, AB-015b, and AA-017d, the permittee shall comply with the reporting requirements as described in 40 CFR 60.48c(a), Subpart Dc. (40 CFR 60, Subpart Dc)
- 5.A.10 The permittee shall submit to MDEQ in writing the effective date of start up date no later than 10 days after commencement of operation. (Ref. PSD Construction Permit Issued March 31, 2005 and August 27, 2007)
- 5.A.11 This permit does not authorize a modification as defined in Regulation APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". A modification requires a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
  - (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
    - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
  - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
  - (f) any change in ownership of the stationary source.

