

57-0189 – SAR Review Notes – July 1– December 31, 2013

SARs and corresponding due dates:

- SAR for period of July 1 – December 31 – Due March 1st or February 29th (Leap year)
- SAR for the period of January 1 – June 30 – Due August 29th
- Report Racking # - 15634

Title V permit 558867 requires the SARs to Included:

- (1) Any monitoring and recordkeeping required by the following logs and conditions: Logs 1 and 2 of E4-8 (i.e.E4-9), E4-10, Logs 4 and 5 of E4-11, Logs 7 of E6-2 and Log 9 of E8-4. Summaries are acceptable provided sufficient information is provided to determine compliance.
- (2) VEE readings from Conditions E3-1, E4-13, E5-9 and E7-8. A summary is also acceptable.
- (3) Identification of all deviations from all permit requirements.

Condition by Condition review of items (1) and (2) above:

Condition E4-8 – Annual Emissions Requirements. *Condition E4-8 is not listed in E2(a); however, it appears that is should be referenced rather than Condition E4-9, which does not include a Log 1 & 2.* Logs 1 and Log 2 as required by Condition E4-8 are both retained in the format identical to that provided in the Title V permit. **No problems noted with the log format.**

- E4-2 – limit PM emitted from the control system to 40.76 lbs/hr. Compliance is assured by complying with Conditions E4-10 (Opacity Restrictions) and E4-11 (Daily Recordkeeping Requirements). **In compliance, the facility complied with the requirements of Condition E4-10 and E4-11.**
- E4-3 – limits PM emitted that bypasses the control system to 3.8 lbs/hr and 13.5 tons during any interval of 12-consecutive months.
 - Compliance with the hourly limit is based on complying with Conditions E4-10 (Opacity Restrictions) and E4-11 (Daily Recordkeeping Requirements). **In compliance, the facility complied with the requirements of Condition E4-10 and E4-11.**
 - Compliance with the yearly limit is assured by completing Log 2. **In compliance, the maximum 12-month PM emissions for this inspection period was 6.56 tons during the period ending in July 2013.**
- Question related to Condition E4-3 – Conditions E4-4 (SO₂), E4-5(VOC), E4-6 (NO_x) and E4-7 (CO) all provide limits in lbs/hr. The compliance method for

each permit conditions states, "Compliance with this limit shall be assured by completing Log 1. Compliance with the hourly limit shall be assured by the calculation that the emissions on an hourly basis at maximum capacity are less than the stated allowable emission limit for each of the emission limit of SO₂, VOC, NO_x and CO." However, Logs 1 and 2 only list emissions in tons/year. Does this mean no ongoing records must be kept and facility is in compliance as long as they don't exceed the maximum steel production rates of 135 tons/hr or 1,100,000 tons during any interval of 12-consecutive months?

Condition E4-9 – Performance Test Requirements. Item (1) above references Log 1 and Log 2 in relation to this permit condition. **No such logs are listed in this condition. Appears to be an error or a typo in the Title V permit.**

Condition E4-10 – Opacity Restrictions. This condition provides guidance related to the opacity limitations, VEE frequency and other relevant guidance pertaining to VEEs. **In compliance, a copy of Log 3 – Log Opacity Observations for Compliance Purposes was submitted for Outlet Baghouse #1, Outlet Baghouse #2 and the Outlet Baghouse Canopy for the period of July 1 – December 31 of 2013 (3rd & 4th Quarters of 2013). The facility complied with the requirements of Condition #4-10(a)(4) which states, "Visible emissions evaluations shall be performed on at least 93% of the EAF's operational days during each calendar quarter. The lowest value noted for these two quarters was 98%.**

Condition E4-11 – Daily Recordkeeping requirements. The following daily records must be maintained:

1. Time and duration of each charge – Daily log were submitted for the period of 7/1 – 12/31/2013 in this SAR. The source ceased operation for the year on 12/17/2013. **Time and duration of each charge is provided.**
2. Time and duration of each tap - Daily log were submitted for the period of 7/1 – 12/31/2013 in this SAR. 12/17/2013. **Time and duration of each tap is provided.**
3. (A) Flow data obtained by checking the control system's fan motor amperes and damper position once per shift. **The fan amperes and damper position are provided in the log for both the day and the night shift.**
4. Perform monthly operational status of the equipment that is important to the performance of the total capture system. **A log (Log 5) which documents the required inspections and maintenance was provided for the months of January – December 2013. The log contains the required information.**

Condition E6-2 (Log 7) – Particulate Matter Limitations - limits PM emitted from the process to < 2.15 lbs/hr. Compliance is based on maintaining a pressure drop across the baghouse of 1.0 inch of water. Log 7 is used to document compliance. **I reviewed Log 7 for the months of July – December 2013. The pressure drop value for 11/25/2013 was listed as 0. I contacted**

Melanie Ragan with Gerdau, who explained that facility personnel failed to check and record the pressure drop for that date due to sporadic production. The company failed to list this issue as a deviation. **The deviation noted above did not cause the emissions source to exceed the de minimis level for excursions for the SAR period. The excursion percentage was 0.89% (1 excursion-deviation / 112 days of operation).** All other values were > 1.0. Log is kept as required.

Condition E8-4 (Log 9) – Actual Emissions for Fee Purposes – **The required log is retained and was provided for the SAR period of July – December 2013.** The proper factor of 25.0 lbs/hr was used to calculate PM emissions. The log also lists the operating hours for this emission source.

Notes/comments:

- SAR received in the Jackson EFO on **January 8, 2014** via email.
- **1 excursion or deviation** was noted for Source #03 (Log 7). The calculated excursion % did not rise to the level of a violation. The company failed to list this excursion in the SAR.
- Condition E2(a) references Logs 1 and 2 associated with E4-9. Logs 1 & 2 are associated with Condition E4-8.
- There were **16 days** when the VEE logs (Log 3) noted that no VEEs were completed due the fact that there was “No Daylight Operation”. I first discussed this issue with Will Ownby, the company contact, who explained that these were days where the facility only operated at night. I contacted Mr. Alvin Pratt, TPACD – Compliance Validation Program, during a previous SAR review and verified that these **16 days** did not constitute a failure to conduct VEEs and would not count against the facility in regard to the 93% VEE completion rate listed in Condition E4-10. Alvin explained that the facility did not miss a day of conducting VEEs if the source did not run during daylight hours.
- Previously, Mr. Ownby and I have discussed the fact that there is no need to submit all of the completed VEE forms for each SAR period. **Carol Williams and I agreed that a summary of the VEEs would be acceptable. The facility submitted a summary of the VEEs that were completed. This summary will be cross-referenced with the VEEs retained on-site during site inspections.**
 - Mr. Ownby and I discussed the fact that the Quarterly VEE reports would still need to be submitted to the Compliance Validation Program in the Nashville Central Office.
 - The MACT report for this SAR period is submitted separately from the Title V SAR and is submitted to the Nashville Central Office. As of 1/13/2014, the MACT report receipt is not listed in Smog Log. This report is not due until 3/31/2014.