

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF AIR POLLUTION CONTROL

William R. Snodgrass Tennessee Tower, 15th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 (615) 532-0554 Voice or (615) 532-0614 FAX

October 12, 2021

Certified Article Number

9414 7266 9904 2170 **0989 50** SENDER'S RECORD

Mr. Josh Wigger, Vice President/General Manager Gerdau Ameristeel US Inc. PO Box 10848 Jackson, TN, 38308

Re:

Construction Permit Application Gerdau Ameristeel US Inc. – 801 Gerdau Drive, Jackson, TN, 38305 Emission Source Reference No. 57-0189-11 / Permit No. 979247

Dear Mr. Wigger:

Your construction permit application dated August 3, 2021 for a new post process heating operation was received on August 3, 2021. It has been determined that additional information is rquired in order to continue processing this application. Please be advised that construction or modification of the source cannot begin until you are in receipt of the issued construction/modification permit. A determination has been made that the following information is needed:

Additional information is needed as follows:

- 1. Provide a PSD analysis. This would be a comparison of potential emission increases and the PSD significant increase levels. Your facility is an existing major source for PSD purposes. This would include a comparison of maximum pollutant emissions per hour for all pollutants, maximum pollutant emissions in tons at 8760 hours per year, and pollutant emissions at the proposed limit in tons per proposed 12-month period (currently this is proposed as 4,700 hours per 12-month period). Also, because your facility is a major source for PSD purposes, please verify that this project is not related to (or would not be considered a part of) any other relatively new permitted process at your facility, and that it does not debottle neck a process or cumulatively increase the emissions of any of the criteria pollutants above the PSD increment thresholds.
- 2. The current agreement letter as submitted has a restriction on the hours of operation per 12-month period (currently at 4,700 hours) for the post process heating operation; however, it does not include a limit of NOx emissions per hour and NOx emissions per consecutive 12-month period. Please include proposed NOx emission limits in term of pounds per hour and also tons per consecutive 12-month period and specify how compliance with this limit will be demonstrated.

Mr. Wigger
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If any of this information has already been submitted, please resubmit and assemble together in one document, or contact us to discuss where the information is located.

Please submit the additional information to the Technical Secretary at the letterhead address or email the information to <u>Air.Pollution.Control@TN.gov</u> in Adobe pdf format within fourteen days of receipt of this letter so that the Division can review the revised application for adequacy.

If you have any questions concerning this correspondence, please contact Mr. Greg Forte a t 615-532-0548 or greg.forte@tn.gov. Your Facility ID is 57-0189, please reference this number in any further correspondence with the Division.

Sincerely,

James P. Johnston, P.E.

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Deputy Director

Permitting & Regulatory Development