

CONSTRUCTION PERMIT SUMMARY REPORT

Company Name: Gerdau Ameristeel US Inc. File Number: 57-0189 EPS Initials: GJF
Permit Number(s): 979247 Source Point Number(s): 11
Application Received (date): August 3, 2021 Application Complete (date): September 2, 2021
Air Quality Analysis Performed? Yes ☐ No ☒

Briefly describe the project: (new source, modifications) (what the process is) (type controls proposed) (emissions expected, qualitative) (replacing what sources) (background information)

This source is a new Post Processing Heating Operation for round steel bars (heat treating). Natural gas is the only fuel, and there is no control. The only pollutants are products of combustion, NOx, CO, PM, SO2, and VOC. The facility has an existing Title V permit 574449 for a Steel Scrap recycling Mill. The facility has proposed emission limits of 0.16 lb/hr for PM and also 4,700 hours per 12-month period. At 8760 hours, the NOx actual emissions would equal 9.28 tons. However, at 4,760 hours per 12-month period, the NOx emissions would equal 4.98 tons per 12-months. The company has proposed NOx limits of 2.12 pounds per hour and 4.98 tons per year. This limitation means that this combustion source will not need to use low-NOx technology. This facility is one of the 28 listed source categories found in Tenn. Comp. R. & Regs. 1200-03-09-.01(4)(b)1.(i), and is major for PSD. The facility provided a PSD analysis dated October 15, 2021 to verify that, with regard to the EPA policy concerning Aggregation, this construction was not related to any recent projects. The October 15, 2021 analysis stated that the most recent projects were non-ferrous metal operations associated with recovery of non-ferrous metals from scrap operations. It was also stated that this project was for the post-processing of already produced bar and does not debottleneck any upstream operations. The company has submitted a table demonstrating that the unlimited potential to emit for each pollutant would be below the significant increase threshold.

The most recent construction permits were: 974353 Amendment 1 Scrap Steel Raw Material Processing: Auto Shredder Residue Dryer Issued Dec. 20, 2018 with Amendment issued February 28, 2020, and 972680 issued July 12, 2017 for an Electrically Powered Scrap Steel Shredder with an Increase in Non-ferrous Material Handling rate.

This proposed project would result in potential emissions below the PSD significance thresholds, and therefore, is not subject to PSD review. There are no applicable NSPS or NESHAP rules for this source.

As of 10/1/2021, Madison County is not a Permit registry county

Rules Analysis

Title V ☒ Cond. Major ☐ Minor ☐ Source category listed in 1200-3-9-.01(4)(b)1.(i)? Yes ☒ No ☐

Reason for PSD:	New source above ____ TPY	<input type="checkbox"/>	Sig. increase in ____ emissions	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NSPS:	40 CFR Part 60, Subpart ____	<input type="checkbox"/>	State Rule 1200-3-16-. ____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NESHAP:	40 CFR Part 61, Subpart ____	<input type="checkbox"/>	State Rule 1200-3-11-. ____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Applicable NESHAP:	40 CFR Part 63, Subpart ____	<input type="checkbox"/>	State Rule 1200-3-31-. ____	<input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

Other Applicable State Rules

PM Emissions:	1200-3-	<u>07</u>	-	<u>0(5)</u>	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	____ Emissions:	1200-3-	____	-	____	<input type="checkbox"/>	N/A <input type="checkbox"/>
SO ₂ Emissions:	1200-3-	<u>14</u>	-	<u>.03(5)</u>	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	NO _x Emissions:	1200-3-	<u>07-.01(5)</u>	-	____	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
CO Emissions:	1200-3-	<u>07</u>	-	<u>.07(2)</u>	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	____ Emissions:	1200-3-	____	-	____	<input type="checkbox"/>	N/A <input type="checkbox"/>
VOC Emissions:	1200-3-	<u>07</u>	-	<u>.07(2)</u>	<input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	____ Emissions:	1200-3-	____	-	____	<input type="checkbox"/>	N/A <input type="checkbox"/>

All annual emissions allowable values above are limited by the 4700 hours per 12-months operating limit

Visible Emissions from this Source not to exceed 20 % opacity per Method 9 (Rule 1200-3- 05-

Comments: _____

APC Financial Review Report indicates no Balance >\$0 Past Due Date

Emission Summary

Permit Number: 979247

Source Status: New ☒ Modification ☐ Expansion ☐ Relocation ☐ Permit Status: New ☒ Renewal ☐

PSD ☐ NSPS ☒ NESHAPs ☐ Previous Permit Number: Construction _____ Operating _____

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable Standard 1200-03-
	Actual	Potential	Allowable	Actual	Potential	Allowable	Net Change			
PM	0.16	0.16	0.16	0.376	0.38	0.38		8/3/2021	3	07-.01(5)
SO2	0.02	0.02	0.02	0.05	0.05	0.05		8/3/2021	3	14-.03(5)
CO	1.78	1.78	1.78	4.18	4.18	4.18		8/3/2021	3	07-.07(2)
VOC	0.12	0.12	0.12	0.28	0.28	0.28		8/3/2021	3	07-.07(2)
NOx	2.12	2.12	2.12	4.98	4.98	4.98		10/15/2021	3	07-.07(2)

* - Source of data from permit application and agreement letter dated August 3, 2021 stating the permittee's request to limit operating hours to 4,700 hours per year. Actual emissions are derived using AP-42 Chapter 1.4 Natural Gas Tables 1.4-1 for NOx and CO and 1-4-2 for PM, SO2 and VOC 11.19.2 The agreed limit of 4,760 hours per year keeps the NOx emissions below 5 tons/year, avoiding the requirements for low-NOx technology. Also the Agreement Letter dated October 15, 2021 sets NOx lb/hr and tons/12-months limits.

The permittee cannot increase their operating hours without adding low-NOx technology per the 9/21/2020 low-NOx guidance.

PERMITTING PROGRAM: GJF DATE: November 17, 2021