



**STATE OF TENNESSEE  
AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE**

**PERMIT TO CONSTRUCT / MODIFY AIR CONTAMINANT SOURCE(S)**

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**Permit Number:** 979247  
**Facility (Permittee):** Gerdau Ameristeel US Inc  
**Facility ID:** 57-0189  
**Facility Address:** 801 Gerdau Drive, Jackson 38305  
Madison County  
**Facility Classification:** Title V  
**Federal Requirements:** None  
**Facility Description:** Scrap Steel Raw Material Processing

Permit 979247 consisting of 22 pages is hereby issued November 18, 2021, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit supersedes all previously issued permits for this/these source(s). This permit expires on November 17, 2023. The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

Michelle W. Owenby  
Technical Secretary  
Tennessee Air Pollution Control Board

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No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

## **Section I – Sources Included in this Construction Permit**

FACILITY DESCRIPTION			
Source	Source Description	Status	Control
11	Post processing heating operation for round bars	New	

## **Section II – Permit Record**

Permit Type	Description of Permit Action	Issue Date
Construction	Permit Issuance	November 18, 2021

## **Section III - General Permit Conditions**

### **G1. Responsible Person**

The application that was utilized in the preparation of this construction permit is dated August 3, 2021 and is signed by Josh Wigger, Vice President/General Manager, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after the change. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

### **G2. Application and Agreement Letters**

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

### G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit all plans, checklists, certifications, notifications, test protocols, reports, applications, and fees to the attention of the following Division Programs at the addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
<ul style="list-style-type: none"><li>• Notifications</li><li>• Startup certifications</li><li>• Applications</li><li>• NSPS reports</li><li>• MACT/GACT/NESHAP reports</li><li>• Fees</li><li>• Emission statements</li><li>• Construction permit extension requests</li></ul>	<ul style="list-style-type: none"><li>• Test protocols</li><li>• Emission test reports</li><li>• Visible emission evaluation reports</li></ul>	<ul style="list-style-type: none"><li>• Semiannual reports</li><li>• Annual compliance status reports</li></ul>
Division of Air Pollution Control William R. Snodgrass TN Tower, 15 <sup>th</sup> Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 <a href="mailto:Air.Pollution.Control@tn.gov">Air.Pollution.Control@tn.gov</a>		Jackson Field Office 1625 Hollywood Drive Jackson, Tennessee 38401 Or E-mail: <a href="mailto:APC.JackEFO@tn.gov">APC.JackEFO@tn.gov</a>

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the mailing addresses above, the permittee may submit the information to the attention of the respective Division Programs via e-mail in Adobe Portable Document format (PDF) to the specified email address.

The permittee shall submit records of operating hours for this source as required by condition S1-3 of this permit with the Semiannual report required by Condition E2(a) of T5 operating permit 574449. This reporting shall commence during the Semiannual report period when the Post Processing Heating Operation begins operating.

TAPCR 1200-03-09-.03(8)

### G4. Notification of changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

**G5. Permit Transference**

- A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

- B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

**G6. Operating Permit Application Submittal**

The permittee shall apply for a Title V Significant Modification within 30 days of initial startup of this new or modified emission source.

TAPCR 1200-03-09-.02(11)(d)1(i)(II)

**G7. Temporary Operating Permit**

- A. This construction permit shall serve as a temporary operating permit from the date of issuance, until the Technical Secretary issues a Title V significant modification operating permit, provided the permittee submits a significant modification application within the timeframe specified in **Condition G6**.

TAPCR 1200-03-09-.02(1), 1200-03-09-.02(2) and 1200-03-09-.02(3)(b)(1)

- B. If construction of the air contaminant source(s) cannot be completed and/or an operating permit application cannot be filed with the Technical Secretary by the expiration date of this permit, the permittee must submit a permit extension request 30 days prior to permit expiration.

TAPCR 1200-03-09-.02(1) and 1200-03-09-.02(3)

**G8. Startup Certification for New or Modified Source(s)**

The startup certification provided in Appendix 4 shall be submitted to the Permitting Program once an air contaminant source has started up. Startup of the air contaminant source shall be the date the

new or modified air contaminant source began operation for the production of product for sale, use as raw materials, or steam or heat production under the terms of this permit.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** The startup certification provided in Appendix 4 shall be submitted no later than 30 days after each air contaminant source has begun startup.

## **G9. Fees**

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable Title V Major Source annual emission fees to the Tennessee Division of Air Pollution Control based on the Provisions of 1200-03-26-.02(9) of the TAPCR.

A responsible official of a major source or a source subject to paragraph (11) of Rule 1200-03-09-.02 (hereinafter, "Paragraph 11 source") must pay an annual fee to the State of Tennessee. A major source or Paragraph 11 source is not subject to the minor and conditional major source annual fees of paragraph (6) of this rule on or after July 1, 1994. Once a major stationary source or Paragraph 11 source begins to pay major source annual fees pursuant to this paragraph (9), it will not be subject to the construction permit fees of paragraph (5) of this rule for any additional construction occurring at the source as long as the source remains a major source or Paragraph 11 source.

(i) Sources choosing to pay annual fees on an allowable emissions basis pursuant to subparagraph 1200-03-26-.02(9)(b) of this paragraph shall pay 100% of the fee due pursuant to subparagraph 1200-03-26-.02(9)(d).

(I) No later than April 1 of the year immediately following the annual accounting period for which the fee is due for sources paying on a calendar year basis pursuant to subparagraph 1200-03-26-.02(9) (b)

or (II) No later than April 1 of the current fiscal year for sources paying on a fiscal year basis pursuant to subparagraph 1200-03-26-.02(9) (b)

(ii) Sources choosing to pay annual fees on an actual emissions basis or a combination of actual and allowable emissions basis and on a calendar year basis pursuant to subparagraph 1200-03-26-.02(9) (b) shall pay 100% of the fee due pursuant to subparagraph 1200-03-26-.02(9) (d) no later than April 1 of the year immediately following the annual accounting period for which the fee is due, except as allowed by part 1200-03-26-.02(9) (g)3.

(iii) Sources choosing to pay annual fees on an actual emissions basis or a combination of actual and allowable emissions basis and on a fiscal year basis pursuant to subparagraph 1200-03-26-.02(9) (b) of this paragraph shall pay an estimated 65% of the fee due pursuant to subparagraph 1200-03-26-.02(9) (d) of this paragraph no later than April 1 of the current fiscal year. The remainder of the annual fee is due July 1 of each year, except as allowed by part 1200-03-26-.02(9) (g)3.

TAPCR 1200-03-26-.02 (9)

**G10. General Recordkeeping Requirements**

- A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

- B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

**G11. Routine Maintenance Requirements**

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

**G12. Visible and Fugitive Emissions**

- A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

**Compliance Method:** When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

- B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:
- (a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
  - (b) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
  - (c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

**Compliance Method:** Fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

- C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

**Compliance Method:** When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

TAPCR 1200-03-08-.03

**G13. Facility-wide Limitations**

**Not applicable**

**G14. NSPS/NESHAP/MACT/GACT Standards**

**Not applicable**

**G15. VOC and NO<sub>x</sub> Emission Statement**

Not applicable

**G16. Source Testing Requirements**

Not applicable

**Section IV - Source Specific Permit Conditions**

Source No	Source Description
11	Post Processing Heating Operation for Steel bars - Natural gas fired at 21.6 MMBtu/hr

**S11-1. Input Limitation(s) or Statement(s) of Design**

- A. The design heat input rate of the Post Processing Heating Operation (for Steel Bars) is 21.6 MMBTU/hr. Should the permittee need to modify the Post Processing Heating Operation in a manner that increases the design heat input rate, a Title V modification shall be applied for and received in accordance with TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated August 3, 2021 from the permittee.

**COMPLIANCE METHOD:** The permittee shall maintain documentation to demonstrate the heat input capacity for the Post Processing Heating Operation. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- B. Only natural gas shall be used as fuel(s) for the Post Processing Heating Operation. The Post Processing Heating Operation is only capable of burning this fuel(s). Should the permittee need to modify the Post Processing Heating Operation to allow the use of a fuel other than natural gas, a Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

TAPCR 1200-03-09-.03(8) and the application dated August 3, 2021 from the permittee.

**COMPLIANCE METHOD:** The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the Post Processing Heating Operation. Documentation shall include, but is not limited to, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**S11-2. Production Limitation(s)**

**Not applicable**

**S11-3. Operating Hour Limitation(s)**

The Post Processing Heating Operation shall not operate more than 4,700 hours over any consecutive 12-month period.

TAPCR 1200-03-07-.01(5) and the agreement letter dated August 3, 2021 from the permittee. (Appendix 7)

**COMPLIANCE METHOD:** The permittee shall record the actual operating hours of the Post Processing Heating Operation on a daily basis in a log in the format below (see example) or in an alternative format which provides the same information. The log shall be retained in accordance with **Condition G10**.

**Log 9 Hours of Operation, daily basis**      **Source # 11**

**(this is Log 15 according to internal Gerdau Log Numbering System)**

**Month: \_\_\_\_\_ YEAR \_\_\_\_\_**

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Date	Hours of Operation	Date	Hours of Operation
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			
Total Hours per Month			

**Log10 Hours of Operation, 12-Consecutive Month Total**    *Source #* 11  
(this is Log 16 according to internal Gerdau Log Numbering System)

Month and Year	Hours of Operation for Month	Previous 11 month Total	12-Consecutive Month Total

*Note:* The tons per 12-consecutive month values are the sum of the ‘description’ (hours) in the 11 months preceding the month just completed + the ‘description’ in the month just completed. If data is not available for the 11 months preceding the initial use of the table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

**S11-4.      Emission Limitation(s)**

- A.    Particulate matter (PM) emitted from this source shall not exceed 0.16 pounds per hour, daily average basis.

TAPCR 1200-03-07-.01(5) and the agreement letter with date August 3, 2021. See Appendix 7

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Conditions S1-1 A** (design heat input rate), **S1-1 B** (fuel type) and the emission factor of 7.6 lbs. PM/MMSCF natural gas combusted from AP-42, Chapter 1.4 Natural Gas Combustion, table number 1.4-2

- B.    Sulfur dioxide emitted from this source shall not exceed 0.02 pounds per hour on a daily average basis.

TAPCR 1200-03-14-.03(5) and the application with date August 3, 2021.

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Conditions S1-1 A** (design heat input rate), **S1-1 B** (fuel type) and the emission factor of 0.6 lbs. SO<sub>2</sub>/MMSCF natural gas combusted from AP-42, Chapter 1.4 Natural Gas Combustion, table number 1.4-2

- C. Carbon Monoxide (CO) emitted from this source shall not exceed 4.18 tons per any consecutive 12-month period.

TAPCR 1200-03-07-.07(2) and the application with date August 3, 2021.

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Conditions S1-1 A** (design heat input rate, **S1-1 B** (fuel type) and the emission factor of 84 lbs. CO/MMSCF natural gas combusted from AP-42, Chapter 1.4 Natural Gas Combustion, table number 1.4-1, and the 4,700 hour per year Operating Hours Limitation specified at condition S1-3.

- D. Volatile Organic Compounds (VOC) emitted from this source shall not exceed 0.28 tons per any consecutive 12-month period.

TAPCR 1200-03-07-.07(2) and the application with date August 3, 2021.

**Compliance Method:** Compliance with this emission limitation is assured by compliance with **Conditions S1-1 A** (design heat input rate), **S1-1 B** (fuel type), and the emission factor of 5.5 lbs. VOC/MMSCF natural gas combusted from AP-42, Chapter 1.4 Natural Gas Combustion, table number 1.4-2, and the 4,700 hour per year operating hours limitation specified at condition S1-3.

- E. Nitrogen oxides (NO<sub>x</sub>) emitted from this source shall not exceed 2.12 pounds per hour and 4.98 tons per any consecutive 12-month period.

TAPCR 1200-03-07-.07(2) the application with date August 3, 2021, and the agreement letter dated October 15, 2021 See Appendix 7.

**Compliance Method:** Compliance with the hourly emission limitation is assured by compliance with **Conditions S1-1 A** (design heat input rate), **S1-1 B** (fuel type), and the emission factor of 100 lbs. NO<sub>x</sub>/MMSCF natural gas combusted from AP-42, Chapter 1.4 Natural Gas Combustion, table number 1.4-1. Compliance with the 12-month emission limit is also based on the 4,700 hour per year Operating Hours Limitation specified at condition S1-3. See the agreement letters dated August 3, 2021 and October 15, 2021 at Appendix 7.

**S11-5. Source-Specific Visible Emissions Limitation(s)**

**Not applicable**

(end of conditions)

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The permit application gives the location of this source as 3955234.72 UTM vertical and 336276.56 horizontal

## Appendix 1: Notification of Change in Responsible Person

**Facility (Permittee)** \_\_\_\_\_ Gerdau Ameristeel US Inc \_\_\_\_\_

**Facility ID** \_\_\_\_\_ 57-0189 \_\_\_\_\_

**Former Responsible Person** \_\_\_\_\_  
Name Title

**New Responsible Person** \_\_\_\_\_  
Name Title  
\_\_\_\_\_  
Email

**Date New Responsible Person was assigned this duty:** \_\_\_\_\_

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

## Appendix 2: Notification of Changes

Facility (Permittee) Gerdau Ameristeel US Inc

Facility ID 57-0189

Source No.

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

### Appendix 3: Notification of Ownership Change

Facility (Permittee) \_\_\_\_\_ Gerdau Ameristeel US Inc \_\_\_\_\_ (Previous Owner)

Facility ID \_\_\_\_\_ 57-0189 \_\_\_\_\_

Facility (Permittee) \_\_\_\_\_ (New Owner)

Email Address \_\_\_\_\_

Secretary of State Control Number \_\_\_\_\_ [as registered with the TN Secretary of State]

Date of Ownership Change \_\_\_\_\_

Comments:

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30<sup>1</sup>, and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

<sup>1</sup> Appropriate application forms must be submitted prior to modification of the stationary source(s).

## Appendix 4: Startup Certification

**Facility (Permittee):** Gerdau Ameristeel US Inc

**Facility ID** 57-0189-11

**Startup Certification for Source No.** \_\_\_\_\_

The permittee shall certify the startup date for each new or modified air contaminant source regulated by construction permit 979247 by submitting this document

**Date of startup:** \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
Month Day Year

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Startup Certification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

## Appendix 5: Fees

Not applicable

## **Appendix 6: Emission Statement for VOC and NO<sub>x</sub>**

**Not Applicable**

## **Appendix 7: Agreement Letters**



August 3, 2021

Technical Secretary  
Tennessee Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15th Floor  
Nashville, TN 37243

**RE: Gerdau AmeriSteel U.S. Inc., Facility ID 57-0189  
Jackson, TN Facility  
Construction Permit Application for Post Processing Heating Operation for Round Bars**

To Whom It May Concern:

On behalf of Gerdau AmeriSteel U.S. Inc., please find the enclosed a construction permit application for the relocation of a post processing heating operation for round bars from the Minnesota facility to the Jackson, TN facility. Gerdau AmeriSteel U.S. Inc. (Gerdau) owns and operates a steel mill facility including a steel scrap shredder and electric arc steel melting furnace (EAF) located at 801 Gerdau Drive in Jackson, Madison County, Tennessee. The facility currently operates under the authority granted by Title V Permit No. 574449 issued on December 11, 2019 by the Tennessee Department of Environment and Conservation (TDEC).

The proposed project will be minor with respect to federal new source review/prevention of significant deterioration permitting.

As allowed by 1200-03-07-.01(5) of the Tennessee air pollution regulations, Gerdau AmeriSteel formally agrees to limit the hours of operation of this operation to 4,700 hours during any period of twelve consecutive months. Gerdau also agrees to limit particulate matter emissions from this operation to 0.16 pounds per hour (0.38 tons per year).

Should any further information be required, please do not hesitate to contact our consultant, Steve Marquardt of ERM at (615) 656-7100.

Sincerely,

A handwritten signature in black ink, appearing to read 'Josh Wigger'.

Josh Wigger, Vice President/General Manager



October 15, 2021

Technical Secretary  
Tennessee Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15th Floor  
Nashville, TN 37243

RE: Agreement Letter for NOx  
Gerdau AmeriSteel U.S. Inc.,  
Emission Source Reference No. 57-0189-11/ Permit No. 979247

To Whom It May Concern:

In accordance with TAPCR 1200-03-07-.07(2), Gerdau AmeriSteel U.S. Inc., agrees to the following NOx limits for the post process heating operation as the above referenced source.

	NOx Emission Limit	
	Pound per Hour	Ton per year
Agreed Emission Limit	2.12	4.98

Compliance will be demonstrated by tracking hours of operations of the post process heating operation and the use of NOx emission factor from AP-42, 5th Edition, Volume I, Section 1.4: Natural Gas Combustion, Table 1.4-1 and the capacity of the burners.

I have reviewed this document in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Should you have any questions or concerns, please feel free to contact Mr. Will Ownby, Environmental Manager, at (731)423-5274.

Sincerely,

A handwritten signature in black ink, appearing to read 'Josh P. Wigger'.

Josh Wigger, Vice President/General Manager

Attachments

Cc: Greg Forte, TDEC  
Will Ownby, Gerdau  
Jeff Twaddle, ERM