



January 29, 2024

Tennessee Department of Environment and Conservation
Jackson, TN EFO
Attn: Division of Air Pollution – Terri Ledsinger
1625 Hollywood Drive
Jackson, TN 38305

Dear Terri;

Attached is a submission of Gerdau Jackson Tennessee Steel Mill's annual compliance certification for Title V operating permit number 574449 and construction permits 974353 (from Jan. 1- to Oct. 2, 2023) and 979247 as required for the period of January 1, through December 31, 2023. A Significant Modification was issued October 3, 2023. There were zero (0) deviations for the reporting period as noted in the Compliance Statement.

Should you have any questions or need any additional information please contact Will Ownby at (731) 423-5274 or william.ownby@gerdau.com.

Sincerely,

A handwritten signature in black ink that reads 'Will Ownby'.

Will Ownby
Environmental Manager
Gerdau
Jackson Tennessee Steel Mill



January 29, 2024

Air and EPCRA Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta GA, 30303

Dear EPA Official;

Attached is a submission of Gerdau Jackson Tennessee Steel Mill's annual compliance certification for Title V operating permit number 574449 and construction permits 974353 (from Jan. 1- to Oct. 2, 2023) and 979247 as required for the period of January 1, through December 31, 2023. A Significant Modification was issued October 3, 2023. There were zero (0) deviations for the reporting period as noted in the Compliance Statement.

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Environmental Manager
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Jackson Tennessee Steel Mill

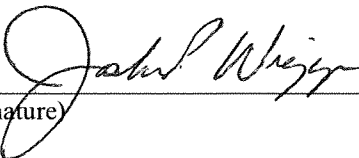
Certified Mail – 7010 1870 0002 3230 4796

CC: Terri Ledsinger

Responsible Official Certification

I, the undersigned, am the responsible official as defined in TAPCR 1200-3-9-.02(11)(b)21 of the Title V source for which this document is being submitted. With the possible exception of those permit terms and conditions identified above (referring to a list of deviation, exceedances and excursions), the emission sources described in permit # 574449 and conditions stated in construction permits # 974353(from Jan. 1- to Oct. 2, 2023) and # 979247 were in compliance with all permit terms and conditions for the period of January 1, 2023 to December 31, 2023 as determined by all required testing and monitoring in the permit and other material information. A Significant Modification was issued October 3, 2023.

I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate and complete.

| | |
|---|-----------------------|
|  | January 29, 2024 |
| (Signature) | (Date) |
| Josh Wigger | V. P. General Manager |
| (Name) | (Title) |

{Note: Attachments, if required are created by the Responsible Official and should consist of the information specified and any supporting required. The Responsible Official may also attach additional information when elaboration is required for clarity.}

January 29, 2024

Identification of all instances of deviations from all permit requirements.

None for the report period January 1, 2023 through December 31, 2023.

Annual Certification of Compliance

Facility Owner/Company Name: Gerdau, Jackson Tennessee Steel Mill
Facility Location: 801 Gerdau Drive, Jackson Tennessee 38305

Emission Source Reference Number: 57-0189

| Title V Permit Number | Reporting Period | Report Deadline |
|---|--|--------------------|
| Permit # 574449 | January 1 of 2023 through December 31 of 2023. | February 1 of 2024 |
| Construction Permit # 979247 | | |
| Construction Permit # 974353 (From Jan.1 to Oct. 2, 2023) | | |

This report is required pursuant to TNAPCR 1200-3-9-.02(11)(e)3(v)(III) and 40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 62, No. 204, October 22, 1997, pages 54946 and 54947.

COMPLIANCE STATEMENT

| Item # 1: Identification of each term or condition of the permit | Item # 2: Identification of the method(s) for assurance of compliance and if necessary the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information. | Item # 4: The status of compliance with the terms and conditions of the permit for the period covered by the certification. The certification shall identify each deviation* and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion** or exceedance*** occurred. | Item # 5: Continuous or intermittent compliance with the permit term or condition |
|--|--|--|---|
| A1 - Definitions | Terms not otherwise defined in the permit - TAPCR 1200-03 | In Compliance - No Deviations | Continuous |
| A2 - Compliance Requirement | Compliance with all terms and conditions pursuant to TAPCR 1200-03-09-.02(11) | In Compliance - No Deviations | Continuous |
| A3 - Need to halt or reduce activity | Halt or reduce activity TAPCR 1200-03-09-.02(11)(e)1(vi)(II) | In Compliance - No Deviations | Continuous |
| A4 - The Permit | Permit change or terminated for cause TAPCR 1200-03-09-.02(11)(e)1(vi)(III) | In Compliance - No Deviations | Continuous |
| A5 - Property Rights | Permit does not convey property rights TAPCR 1200-03-09-.02(11)(e)1(vi)(IV) | In Compliance - No Deviations | Continuous |
| A6 - Submittal of requested information | Submit upon request within reasonable time TAPCR 1200-03-09-.02(11)(e)1(vi)(V) | In Compliance - No Deviations | Continuous |
| A7 - Severability clause | TAPCR 1200-03-09-.02(11)(e)1(v) | In Compliance - No Deviations | Continuous |
| A8 (SM1) - Fee Payment | Payment of fees by July 1 each year | In Compliance - No Deviations | Continuous |
| A9 - Permit revision not required | Not Applicable | In Compliance - No Deviations | Continuous |
| A10 - Inspection and entry | Entry and inspection upon request | In Compliance - No Deviations | Continuous |
| A11 (SM1) - Permit Shield | Method not specified in the Title V Permit | In Compliance - No Deviations | Continuous |
| A12 - Permit renewal and expiration | Submit upon request within reasonable time TAPCR 1200-03-09-.02(11)(e)1(vi)(V) | In Compliance - No Deviations | Continuous |
| A13 - Reopening for cause | Method not specified in the Title V Permit | In Compliance - No Deviations | Continuous |
| A14 - Permit transference | Method not specified in the Title V Permit | In Compliance - No Deviations | Continuous |
| A15 - Air Pollution alert | Not Applicable | In Compliance - No Deviations | Continuous |
| A16 - Construction permit required | Apply for construction permits as required | In Compliance - No Deviations | Continuous |
| A17 - Notification of changes | Notify Technical Secretary 30 days prior of changes | In Compliance - No Deviations | Continuous |
| A18 (SM1) - Schedule of compliance | Method not specified in the Title V Permit | In Compliance - No Deviations | Continuous |
| A19 - Title VI | Comply with 40CFR Part 82 Subpart F for MVACs - Substances removed before acceptance | In Compliance - No Deviations | Continuous |
| A20 - 112(R) | Not Applicable | In Compliance - No Deviations | Continuous |
| B1 - Recordkeeping | As specified in specific source conditions | In Compliance - No Deviations | Continuous |
| B2 - Retention of monitoring data | Records kept for a minimum of 5 years | In Compliance - No Deviations | Continuous |
| B3 - Reporting | Semi annual reports submitted | In Compliance - No Deviations | Continuous |
| B4 - Certification | Certification statement in semiannual reports | In Compliance - No Deviations | Continuous |
| B5 - Annual compliance certification | Annual reports submitted | In Compliance - No Deviations | Continuous |
| B6 - Submission of compliance certification | Certification is submitted to the State and EPA | In Compliance - No Deviations | Continuous |
| B7 - Emergency provisions | Method not specified in the Title V Permit - TAPCR 1200-03-09-.02(11)(e)7 | In Compliance - No Deviations | Continuous |
| B8 - Excess emissions reporting | Report emissions in excess of permit limits within 24 hours | In Compliance - No Deviations | Continuous |
| B9 - Malfunctions, startups & shutdowns | Take reasonable measures to keep emissions to minimum during startup, shut down and malfunctions | In Compliance - No Deviations | Continuous |
| B10 - Report required for Notice Of Violation | Submit report within 20 days of NOV | In Compliance - No Deviations | Continuous |
| B10 (SM1) - Reserved | Reserved | Reserved | Reserved |
| B11 (SM1) - Report required for Notice Of Violation | Submit report within 20 days of NOV | In Compliance - No Deviations | Continuous |
| D1 (SM1) - Visible emissions | Periodic monitoring required-never more than 20% opacity leaving site 1200-03-05 | In Compliance - No Deviations | Continuous |
| D2 - Non process gaseous emissions | Non Applicable | In Compliance - No Deviations | Continuous |
| D3 - Non-process emission | TAPCR 1200-03-06 | In Compliance - No Deviations | Continuous |
| D4 - Provisions for process gaseous | TAPCR 1200-03-07-.07 (2) | In Compliance - No Deviations | Continuous |
| D5 - Particulate emissions from sources | TAPCR 1200-03-07 | In Compliance - No Deviations | Continuous |
| D6 - Sulfur dioxide emission standards | TAPCR 1200-03-14 | In Compliance - No Deviations | Continuous |
| D7 - Fugitive dust | TAPCR 1200-03-08 | In Compliance - No Deviations | Continuous |
| D8 - Open burning | TAPCR 1200-03-04 | In Compliance - No Deviations | Continuous |
| D9 - Asbestos | Must comply with TAPCR 1200-03-11-.02(2)(d) and 40 CFR,Part 61 | In Compliance - No Deviations | Continuous |
| D10 (SM1) - Annual certification of compliance | Submit Annual Certification of Compliance | In Compliance - No Deviations | Continuous |
| D11 (SM1) - Emissions standards for HAPS | Comply with TAPCR 0400-30-38 | In Compliance - No Deviations | Continuous |

Annual Certification of Compliance

Facility Owner/Company Name: Gerdau, Jackson Tennessee Steel Mill
Facility Location: 801 Gerdau Drive, Jackson Tennessee 38305

Emission Source Reference Number: 57-0189

| Title V Permit Number | Reporting Period | Report Deadline |
|---|--|--------------------|
| Permit # 574449 | January 1 of 2023 through December 31 of 2023. | February 1 of 2024 |
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| D12 (SM1) - Standards of performance for new stationary sources | Comply with TAPCR 0040-30-39 | In Compliance - No Deviations | Continuous |
| D13 (SM1) - Gasoline dispensing facilities | Comply with TAPCR 1200-03-18-.24 | In Compliance - No Deviations | Continuous |
| D14 (SM1) - Internal combustion engines | Comply with TAPCR 0400-30-38 and 39 | In Compliance - No Deviations | Continuous |
| E1 - Fee Payment Mixed emission basis | 65% Payment due April 1; 35% Payment due July 1 | In Compliance - No Deviations | Continuous |
| E1 (SM1) - Fee Payment Mixed emission basis | 65% Payment due April 1; 35% Payment due July 1 | In Compliance - No Deviations | Continuous |
| E2 - Reporting requirements | Reporting requirements: (a) Semiannual reports (b) Annual Certification (c) MACT and (d) NSPS | In Compliance - Submitted required reports on time | Continuous |
| E2 (SM1) - Reporting Requirements | Reporting requirements: (a) Semiannual reports (b) Annual Certification (c) MACT and (d) NSPS | In Compliance - Submitted required reports on time | Continuous |
| E3-1 - Visible emission limitation | Daily Visible Emission (VE) readings are completed as required in Title V permit | In Compliance - No Deviations | Continuous |
| E3-2 - Potential to emit HAPS | Non Applicable | In Compliance - No Deviations | Continuous |
| E3-3 - Fugitive dust restriction | Fugitive emissions as determined by Method 4 TAPCR 1200-03-08-.01 | In Compliance - No Deviations | Continuous |
| E3-4 - Fee emission summary table | Complete fee emission summary table in Title V permit | In Compliance - No Deviations | Continuous |
| E3-5 - Fugitive emission restriction | Fugitive dust from roads shall not exceed 10% per Method 1 | In Compliance - No Deviations | Continuous |
| E3-6 - Recordkeeping requirements | Monthly recordkeeping within 30 days, weekly and daily recordkeeping within 7 days | In Compliance - No Deviations | Continuous |
| E3-7 - Repair and maintenance requirements | Recordkeeping | In Compliance - No Deviations | Continuous |
| E3-8 - Identification of Responsible Official, Technical Contact and Billing Contact | Any changes to these must be submitted within thirty (30) days | In Compliance - No Deviations | Continuous |
| E4-1 - Applicable Subpart YYYYY | Comply with TAPCR 1200-03-09-.03(8) | In Compliance - No Deviations | Continuous |
| E4-2 - Chlorinated plastics, lead and free organic liquids | Comply with Pollution Prevention Plan | In Compliance - No Deviations | Continuous |
| E4-3 - Mercury requirements | Comply with Pollution Prevention Plan | In Compliance - No Deviations | Continuous |
| E4-4 - Recordkeeping and reporting requirements | Recordkeeping and submittal of reports | In Compliance - No Deviations | Continuous |
| E4-5 - Capture system for PM | Comply with Pollution Prevention Plan | In Compliance - No Deviations | Continuous |
| E4-6 - Discharge from EAF or AOD vessel | Comply with Pollution Prevention Plan and opacity | In Compliance - No Deviations | Continuous |
| E4-7 - Discharge from EAF or AOD vessel | Comply with Pollution Prevention Plan and opacity | In Compliance - No Deviations | Continuous |
| E4-8 - Performance testing | Conduct Performance testing and submit reports | In Compliance - No Deviations | Continuous |
| E4-9 - Subpart YYYYY monitoring | Compliance with the CAM Plan | In Compliance - No Deviations | Continuous |
| E4-10 - Subpart YYYYY part 60 | Compliance with the CAM Plan | In Compliance - No Deviations | Continuous |
| E4-11 - Notification of compliance status | Submit required reports | In Compliance - No Deviations | Continuous |
| E5-1 - Subpart AA requirements | Comply with TAPCR 1200-03-09-.03(8) | In Compliance - No Deviations | Continuous |
| E5-2 - Discharge and opacity readings | Conduct VEEs - performed on at least 93% of the EAF's operational days during calendar quarter | In Compliance - No Deviations - 100% compliance | Continuous |
| E5-3 - Recordkeeping | Maintain records | In Compliance - No Deviations | Continuous |
| E5-4 - Monthly inspections | Conduct monthly inspections | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity shall not exceed 400 tons per hour daily | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity existing with shredder shall not exceed 80 tons per hour monthly average basis | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity for sorting hub Number 10 shall not exceed 40 tons per hour monthly average basis | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity for sorting hub Number 11 shall not exceed 25 tons per hour monthly average basis | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity for sorting hub Number 12 shall not exceed 45 tons per hour monthly average basis | In Compliance - No Deviations | Continuous |
| E6-1 - Input capacity restriction | Input capacity for sorting hub Number 15 shall not exceed 10 tons per hour monthly average basis | In Compliance - No Deviations | Continuous |
| E6-2 - Particulate Matter (PM) limitation | PM from shredder shall not exceed 25 pounds per hour and 26 tons per year | In Compliance - No Deviations | Continuous |
| E6-2 - Particulate Matter (PM) limitation | PM from non ferrous and sorting hubs shall not exceed 3.26 pounds per hour and 14.28 tons per year | In Compliance - No Deviations | Continuous |
| E6-3 - Operating Hour restriction | Operating hours shall not exceed 2080 hours per year | In Compliance - No Deviations | Continuous |
| E6-3 - Operating Hour restriction | No hour restriction for non ferrous material handling equipment | In Compliance - No Deviations | Continuous |
| E6-4 - Actual emissions for fee purposes | Fee calculation sheet; maintain Log 3 as specified in Title V permit | In Compliance - No Deviations | Continuous |
| E7-1 - Steel production restriction | Source shall not exceed 135 tons per hour and 1,100,000 tons per 12 consecutive months; Logs 4 & 5 | In Compliance - No Deviations | Continuous |
| E7-2 - PM emission limitation control system | PM shall not exceed 0.0041 grains per dry standard ft3 and total 40.76 pounds per hour (lb/hr); Log 5 | In Compliance - No Deviations | Continuous |

Annual Certification of Compliance

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Emission Source Reference Number: 57-0189

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|--|--|--|---|
| E7-3 - PM Emission limitation bypassing control system | Maximum PM emissions shall not exceed 3.8 lb/hr and 13.5 tpy; Log 5 | In Compliance - No Deviations | Continuous |
| E7-4 - Sulfur Dioxide (SO2) Emission limitation | Maximum SO2 emitted shall not exceed 40.5 lb/hr; Log 4 | In Compliance - No Deviations | Continuous |
| E7-5 - Volatile Organic Compounds (VOC) limitations | Maximum VOC emitted shall not exceed 44.5 lb/hour; completion of Log 4 | In Compliance - No Deviations | Continuous |
| E7-6 - Nitrogen Oxides (NOx) limitations | Maximum NOx emitted shall not exceed 72.9 lb/hour; completion of Log 4 | In Compliance - No Deviations | Continuous |
| E7-7 - Carbon Monoxide (CO) limitations | Maximum CO emitted shall not exceed 945 lb/hour; completion of Log 4 | In Compliance - No Deviations | Continuous |
| E7-8 - Lead limitations | Maximum Lead is 1.12 lbs per hour | In Compliance - No Deviations | Continuous |
| E7-9 - Annual Emission Requirement | Maintain Logs 4 and 5 as specified in Title V permit | In Compliance - No Deviations | Continuous |
| E7-10 - Performance Testing Requirements | Conduct performance testing once every 5 years; Last test completed April 2023; Next test will be scheduled for April 2028 | In Compliance - No Deviations | Continuous |
| E7-11 - CAM Requirements | Method Specified in Title V permit - CAM Plan Attachment 5 of the Title V permit | In Compliance - No Deviations | Continuous |
| E7-12 - Stack design | Maintain stack design | In Compliance - No Deviations | Continuous |
| E8-1 - Fuel usage restriction | Only natural gas used for this source | In Compliance - No Deviations | Continuous |
| E8-2 - Heat input restriction | Max heat input shall not exceed 48,000,000 BTU | In Compliance - No Deviations | Continuous |
| E8-3 - PM limitation | PM shall not exceed 1.9 lb/hr and 8.4 tpy; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E8-4 - SO2 limitation | SO2 shall not exceed 0.1 lb/hr and 0.44 tpy; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E8-5 - VOC limitation | VOC shall not exceed 0.26 lb/hr and 1.2 tpy; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E8-6 - Nitrogen Oxides limitation | NOx shall not exceed 7.07 lb/hr and 31.0 tpy; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E8-7 - CO limitations | CO shall not exceed 4.03 lb/hr and 17.7 tpy; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E8-8 - Visible emission limitations | Per Opacity matrix; using ONLY natural gas no opacity reading required | In Compliance - No Deviations | Continuous |
| E9-1 - Fuel use restriction | Natural gas used for this source; No 2 fuel oil not to exceed 1,000,000 gallons for any 12 month period | In Compliance - No Deviations | Continuous |
| E9-2 - Heat input restriction | Maximum rate shall not exceed 144 MMBTU per hour | In Compliance - No Deviations | Continuous |
| E9-3 - Sulfur content limitation | Sulfur content of No.2 fuel oil shall not exceed 0.5% by weight | In Compliance - No Deviations | Continuous |
| E9-4 - PM limitation | PM shall not exceed 2.6 lb/hr; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E9-5 - SO2 limitation | SO2 shall not exceed 73.0 lb/hr; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E9-6 - VOC limitation | VOC shall not exceed 2.0 lb/hr; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E9-7 - Nitrogen oxides | NOx shall not exceed 60.0 lb/hr; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E9-8 - CO limitation | CO shall not exceed 12.1 lb/hr; compliance from calculation using Section 1.4 of AP-42 | In Compliance - No Deviations | Continuous |
| E9-9 - Visible emissions limitation | Per Opacity matrix; using ONLY natural gas no opacity reading required | In Compliance - No Deviations | Continuous |
| E9-10 Actual emissions for fee purposes | Actual emissions determined by completing Log 6 as specified in Title V permit | In Compliance - No Deviations | Continuous |
| E10-1 - Material input restriction | Input shall not exceed 250,000 lb/hr on a daily basis | In Compliance - No Deviations | Continuous |
| E10-2 - PM limitation | PM emitted not to exceed 2.15 lb/hr; compliance by daily Delta P readings greater than 1" H2O; Log 7 | In Compliance - No Deviations | Continuous |
| E10-3 - Actual emissions for fee purposes | Actual emissions determined by completing Log 8 as specified in Title V permit | In Compliance - No Deviations | Continuous |
| E11-1 (SM1) Input capacity restriction | Input capacity shall not exceed 50 tons per hour on a monthly average basis | In Compliance - No Deviations | Continuous |
| E11-2 (SM1) Heat input restriction | Max heat input shall not exceed 34 MMBtu/hour on a monthly averal basis | In Compliance - No Deviations | Continuous |
| E11-3 (SM1) Fuel use restriction | Only natural gas used for this source | In Compliance - No Deviations | Continuous |
| E11-4 (SM1) Particulate Matter (PM) limitation | PM shall not exceed 1.3 lbs./hour; compliance by daily Delta P readings greater than 0.5" H2O | In Compliance - No Deviations | Continuous |
| E11-5 (SM1) Sulfur Dioxide (SO2) Emission limitation | Maximum SO2 emitted shall not exceed 0.06 lb/hr | In Compliance - No Deviations | Continuous |
| E11-6 (SM1) Nitrogen Oxides (NOx) limitations | Maximum NOx emitted shall not exceed 7.9 tpy | In Compliance - No Deviations | Continuous |
| E11-7 (SM1) Carbon Monoxide (CO) limitations | Maximum CO emitted shall not exceed 8.32 tpy | In Compliance - No Deviations | Continuous |
| E11-8 (SM1) Volatile Organic Compounds (VOC) limitations | Maximum VOC emitted shall not exceed 0.82 tpy | In Compliance - No Deviations | Continuous |
| E11-9 (SM1) Applicable Subpart YYYYY | Comply with TAPCR 1200-03-09-.03(8) | In Compliance - No Deviations | Continuous |