

**NOTE:** significant changes were made to the Condition numbers and Log #'s, requirements and emissions limits were not changed

**E2. Reporting requirements.**

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from January 1 through June 30 and July 1 through December 31 of each calendar year and shall be submitted within 60 days after the end of each six-month period. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
565713	July 1, 2019	Day before new permit issuance
574449	Issuance date of new permit	December 31, 2019

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E5-3, E5-4, E6-4, E7-9, E9-10, E10-2, and E10-3** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from **Conditions E3-1, E8-8, and E9-9** of this permit, if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

**E2(SM1). Reporting requirements.**

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from January 1 through June 30 and July 1 through December 31 of each calendar year, and shall be submitted within 60 days after the end of each six-month period. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
565713	July 1, 2019	Day before new permit issuance
574449	Issuance date of new permit	December 31, 2019

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Conditions E5-3, E5-4, E6-4, E7-9, E9-10, E10-2, E10-3, and E11-4(SM1)** of this permit. However, a summary report

of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

- (2) The visible emission evaluation readings from **Conditions E3-1, E8-8, and E9-9** of this permit, if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

#### Condition E3-1

Visible emissions from the sources at this facility, unless otherwise noted, 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. Visible emissions shall be determined by EPA Method 9, as published in the current 40- CFR 60, Appendix A (6-minute average). Compliance Method: The permittee shall assure compliance with the opacity limitation by utilizing the Division's opacity matrix dated June 18, 1996 and amended September 11, 2013 for EPA Method 9 that is enclosed as Attachment 1.

**Comment:** Annual VEEs were conducted on source 05 on 2/14/19. Source 01 non-ferrous shredder was also added to the annual VEE schedule and were conducted on 02/14/20. No VEE's other than those required daily and submitted to Compliance Validation semi-annually were required during this review period.

**NOTE 1** Sources 02, 03, and 04 each have source specific opacity requirements. (See Conditions E7-11 (CAM Plan Attachment 4, E8-8, and E9-9 for details). According to an email dated 12/13/2019 from permitting, Source 05 has potential to emit <10 tpy; therefore, no VEE is required. According to the opacity matrix and an email from the permit writer dated 10/31/2023, Sources 01 and 02 will require a VEE reading within one year of permit expiration. The permit expires 12/10/2024. The facility is aware that a VEE will need to be conducted prior to that and submitted with the SAR for the period in which it is conducted. According to an email from permitting 10/31/2023, Source 10 requires a VEE reading within 1 year of being added to the Title V permit. Due to the expiration date of the Title V permit this VEE will also be the VEE that is required within one year of permit expiration.

**Note 2** Condition E5-2 (previously E5-10 opacity restrictions for source 02 Log 9): conduct daily baghouse VEE readings. These are not required to be submitted with the SAR and are now only required semiannually to compliance validation. During each quarter, there are days listed in the VEE Summary when it is noted that no VEEs were completed due the fact that there was "No Daylight Operation". Brad Garrett first discussed this issue with Will Ownby, the company contact, who explained that these were days where the facility only operated at night. During a previous SAR review, He contacted Mr. Alvin Pratt, TPACD – Compliance Validation Program, concerning this issue. Alvin explained that such 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 E5-10. Alvin explained that the facility did not miss a day of conducting VEES if the source did not run during daylight hours.

Condition E5-3 (previously log 4 condition E5-11)

Pursuant to §60.274, the permittee shall maintain records daily of the following information for each EAF and associated dust handling system:

- a) Time and duration of each charge;
- b) Time and duration of each tap;
- c) Flow data obtained by either:
  - (i) checking and recording the control system's fan motor amperes and damper position once per shift,
  - (ii) installing a continuous monitoring device that records the volumetric flow rate through each separately ducted hood.

Compliance Method: Compliance shall be assured by maintaining a log (**Log 1**, or a similar log that provides the same required information) of the time and duration of each charge, the time and duration of each tap, the fan's amperes (once per shift), and the damper positions (once per shift). This log must be retained for a period of not less than five years and be made available for inspection by the Technical Secretary or a Division representative.

**Comment:** time and duration of each charge and each tap are being kept and were submitted with the SAR. The fan amperes and damper position were provided for both the day and the night shift in a separate report. Logs are kept documenting the required inspections and maintenance were conducted. The log contains all required information.

Condition E5-4 (previously log 5 condition E5-11 )

The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., ductwork, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of hole in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed. Compliance Method: Compliance shall be assured by maintaining a log (**Log 2**, or a similar log that provides the same required information) of monthly inspections. This log must be retained for a period of not less than five years and be made available for inspection by the Technical Secretary or a Division representative.

**Comment:** Monthly inspections are completed and documented. The log contains all required information and was submitted with the SAR.

Source 01

Condition E6-4 (previously log 1 Condition E4-4)

The permittee shall record the operating hours of the scrap shredder and ferrous material handling/separation operations and the non-ferrous material handling operations and calculate actual emissions of PM from these operations on a monthly basis. This data shall be recorded in **Log 3**, or a similar log that provides the same information. For fee purposes, actual emissions shall be determined for each fee accounting period.

**Comment:** Log 3 is retained as required, included the PM emission, and was submitted with the SAR.

#### Source 02

##### Condition E7-9 (previously logs 2 & 3 Condition E5-8)

For fee purposes, the permittee shall calculate actual emissions of SO<sub>2</sub>, VOC, NO<sub>x</sub>, PM, and lead for each fee accounting period. Emissions, as well as tons of steel produced and operating hours, shall be recorded in the following logs, or similar logs that provide the same required information.

**Log 4 and Log 5.**

**Comment:** Logs 4 & 5 are retained as required, included the emission calculations, and were submitted with the SAR. Lead hourly emissions have been added to the log. Maximum steel produced was in October 2023 and was 63,829 tons.

**Note 2:** Source 02 must be in compliance with the CAM plan in the permit as attachment #5. The CAM plan requires a pressure drop between 1.0 -13.0 inches of water across the baghouses. The facility is in the process of updating the CAM plan to reflect changes to condition numbers; however, logs of daily pressure drop are kept to demonstrate compliance. They are not submitted with the SAR but are reviewed during the annual inspection.

#### Source 03

##### Condition E8-8 (previous condition E6-8)

Visible emissions from this source shall not exhibit greater than 10% 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. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (6-minute average). Compliance Method: The permittee shall assure compliance with the opacity limitation by utilizing the Division's opacity matrix dated June 18, 1996 and amended September 11, 2013 for EPA Method 9 that is enclosed as Attachment 1.

**Comment:** No VEEs are required for this source according to the Opacity matrix.

#### Source 04

##### Condition E9-9 (previously condition E7-9)

Visible emissions from this source shall not exhibit greater than ten percent (10%) percent opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (6 minute average). Compliance Method: The permittee shall assure compliance with the opacity limitation by utilizing the Division's opacity matrix dated June 18, 1996 and amended September 11, 2013 for EPA Method 9 that is enclosed as Attachment 1.

**Comment:** No VEEs are required for this source according to the Opacity matrix.

##### Condition E9-10 (previously condition E7-10)

The permittee shall monitor and record the amount of fuel combusted in the reheat furnace on a monthly basis. For fee purposes, the permittee shall calculate actual emissions of PM, SO<sub>2</sub>, NO<sub>x</sub>, and VOC during each fee accounting period. Records of monthly fuel use and actual emissions shall be recorded in **Log 6**, or a similar log that provides the same required information.

**Comment:** Log 6 is retained and was submitted with the SAR.

#### Source 05

##### Condition E10-2 (previously condition E8-2)

PM emitted from this process shall not exceed 2.15 pounds per hour. Compliance Method: Compliance with this emission limitation shall be assured by maintaining a pressure drop across the baghouse greater than or equal to 1.0 inch of water. The permittee shall monitor and record the pressure drop across the baghouse once daily when the source is in operation. The pressure drop shall be recorded in **Log 7** below (or a similar log that provides the same required information). Days when the source does not operate shall be noted. Reports and certifications shall be submitted in accordance with Condition E2 of this permit.

**Comment:** Log 7 is retained and was submitted with the SAR. Minimum pressure drop was 1.2 inches on 10/10/23.

##### Condition E10-3 (previously condition E8-3)

For fee purposes, actual emissions from this source shall be determined for each fee accounting period by completing **Log 8**.

**Comment:** Log 8 is retained and was submitted with the SAR.

#### Source 10

Sig Mod #1 was issued 10/03/23 to add this source to the permit.

##### Condition E11-4 (SM1)

Particulate matter (PM) emitted from the ASR Dryer shall not exceed 1.3 pounds per hour, on a daily average basis (controlled by baghouse). The total annual PM emissions, including fugitive dust from the associated material handling operations (conveyors and storage piles), shall not exceed 12.8 tons during any period of 12 consecutive months. Compliance Method: The permittee shall install, operate, and maintain a baghouse to control particulate matter emissions. The source controlled by the baghouse shall not operate unless the control device is installed and operated. Assure continued compliance by maintaining the “approved” minimum pressure drop of 0.5 inches of water column across each baghouse. Note: The permit has this log labelled as Log 8 although there is already a Log 8. This is a pressure drop log for the ASR dryer.

**Comment:** Log 8 ASR pressure drop log is retained and was submitted with the SAR. Minimum pressure drop was recorded 1.45 inches on 12/08/23.

#### Permit # 979247 source 11

##### Condition G3

The permittee shall submit records of operating hours for this source required by Condition S11-2 of this permit with the Semiannual report required by Condition E2(a) of T5 operating permit 574449. This report shall commence during the semiannual report period when the post processing heating operating begins operating.

**Comment:** labelled Log 9 and Log 10 (should probably be log 10 and 11). This source was started up 4/18/23 according to the startup notification submitted on 5/11/23 within the required timeframe. The facility also submitted the application for Sig Mod for this source on 5/11/23, within the required timeframe. The facility submitted the operating hours log as required.

Conclusion:

- No deviations were found during this inspection period
- Construction permit #974353 was in effect at the site for source 10 until 10/02/23 but does not affect the SAR reporting requirements.
- SAR was signed and certified by Josh Wigger (facility RO) on 1/25/24

**TKL 2/05/24**