

SUPPLEMENT TO PERMIT NO. 579-97

Select Steel Corporation of America
Flint, Michigan

REVISED SEPTEMBER 14, 1998

GENERAL CONDITIONS

1. Rule 201(1) - The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule.
2. Rule 201(4) - If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
3. Rule 201(6)(a) - If this Permit to Install is issued for a process or process equipment located at a stationary source which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
4. Rules 201(7)(a) or 216(1)(a)(v)(A) - Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.
5. Rule 201(7)(b) - Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:
 - A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.
 - B. A schedule of compliance for the process or process equipment as described in Rule 119(a).

- C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.
6. Rule 201(8) and Section 5510 of Act 451, P.A. 1994 - The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Departments' rules or the Clean Air Act.
 7. Rule 219 - A new owner or operator of the process or process equipment covered by this Permit to Install shall immediately make a written request to the Department for a change of ownership or operational control. The request shall include all of the information required in Rule 219(1)(a), (b) and (c). If the request for a change in ownership or operational control is approved, the terms and conditions of this Permit to Install shall apply to the person or legal entity which hereafter owns or operates the process or process equipment for which this Permit to Install is issued. The written request shall be sent to the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909.
 8. Rule 901 - Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
 9. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.
 10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
 11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
 12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

The following terms shall be hereinafter referred to as listed below:

Pollutants:

Particulate matter less than 10 microns in diameter.....	PM-10
Sulfur dioxide.....	SO ₂
Carbon monoxide.....	CO
Nitrogen oxides, as nitrogen dioxide.....	NO ₂
Volatile organic compounds measured as propane.....	VOCs
Lead.....	Pb
Cadmium.....	Cd
Total Chromium.....	Cr
Mercury.....	Hg
Manganese less than 10 microns in diameter.....	Mn
Nickel.....	Ni

“District Supervisor” shall mean the District Supervisor, or delegated representative, Air Quality Division, Michigan Department of Environmental Quality, having compliance jurisdiction over the applicant.

“Melt shop” is defined as that portion of the mill which melts, refines and casts liquid steel.

MELT SHOP

13. Applicant shall notify the District Supervisor in writing within 15 calendar days of the date of commencement of trial operation in accordance with 40 CFR, Part 60.7(a)(3).
14. The CO emission rate from the Electric Arc Furnace and Ladle Furnace, hereafter referred to as “EAF/LF” shall not exceed 2.50 pounds per ton of melted steel, based on a monthly average, nor 107.5 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).
15. The NO₂ emission rate from the EAF/LF, shall not exceed 0.30 pound per ton of melted steel, based on a monthly average, nor 12.9 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).
16. The SO₂ emission rate from the EAF/LF shall not exceed 0.20 pound per ton of melted steel, based on a monthly average, nor 8.6 pounds per hour.
17. The PM-10 emission rate from the EAF, LF, Ladle Dry and Pre-Heat, Vacuum Degasser, Continuous Caster and Torch, hereafter “melt-shop equipment,” that passes through the melt-shop baghouse shall not exceed 0.0018 grain per dry standard cubic foot of exhaust gases, nor 5.4 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).

18. The lead emission rate from the melt-shop equipment that passes through the melt-shop baghouse shall not exceed 0.15 pound per hour. This is equivalent to an emission rate of 2.8 percent of the particulate emissions. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).
19. The VOCs emission rate from the EAF/LF shall not exceed 0.20 pound per ton of melted steel, based on a monthly average, nor 8.6 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to Department Rule 702 of Part 55 Air Pollution Control Rules, Act 251 of 1994, as amended.
20. The NO₂ emission rate from the natural gas-fired reheat furnace, hereafter "reheat furnace," shall not exceed 0.20 pound per MMBtu heat input, nor 10.0 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).
21. The CO emission rate from the reheat furnace shall not exceed 0.07 pound per MMBtu heat input, nor 3.5 pounds per hour. This limit is based on a determination of Best Available Control Technology pursuant to the Federal Prevention of Significant Deterioration Regulations, 40 CFR 52.21, paragraph (j).
22. Visible emissions solely from the EAF and LF that exhaust through the melt-shop baghouse shall not exceed 3% opacity except as specified in the Federal Standards of Performance for New Stationary Sources, 40 CFR, Part 60, Subparts A and AAa.
23. Visible emissions from the melt shop roof monitors shall not exceed 6% opacity except as specified in the Federal Standards of Performance for New Stationary Sources, 40 CFR, Part 60, Subparts A and AAa.
24. Visible emissions from the EAF dust handling system shall not exceed 10% opacity except as specified in the Federal Standards of Performance for New Stationary Sources, 40 CFR, Part 60, Subparts A and AAa.
25. Applicant shall not exceed the limits specified for the following pollutants from the melt-shop equipment that is exhausted through the melt-shop baghouse:

Pollutant	Exhaust Gas Concentration (microgram(s) per dry standard cubic meter)	Hourly Emissions (pound(s) per hour)
Cadmium	6.22	8.1E-3
Chromium	58.4	7.6E-2
Manganese	41.5	5.4E-2
Mercury	3.84	5.0E-3
Nickel	58.4	5.4E-2

26. Within 60 days after achieving the maximum production rate, but not later than 180 days after the commencement of trial operation, Federal Standards of Performance for New Stationary Sources require verification of particulate, and for purposes of this permit as PM-10, emission rates and opacity from the melt-shop equipment by testing, at owner's expense, in accordance

with 40 CFR, Part 60, Subparts A and AAa. Verification of emission rates includes the submittal of a complete report of the test results. Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR, Part 60, Appendix A. No less than 60 days prior to testing, a complete stack testing plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing.

27. Rules 1001, 1003 and 1004 - Within 180 days after commencement of trial operation, verification of Cd, Cr, Ni, Hg and Mn emission rates from the melt-shop equipment by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. No less than 60 days prior to testing, a complete stack testing plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing.
28. Rules 1001, 1003 and 1004 - Within 180 days after commencement of trial operation, verification of CO, NO₂, SO₂, and Pb emission rates from the EAF/LF by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. No less than 60 days prior to testing, a complete stack testing plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing.
29. Rules 1001, 1003 and 1004 - Verification of CO and NO₂ emission rates from the reheat furnace by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.
30. Rules 1001, 1003 and 1004 - Within 180 days after commencement of trial operation, verification of VOCs emission rates from the EAF by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. No less than 60 days prior to testing, a complete stack testing plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing.
31. Within one year of plant start-up, the applicant shall implement a system to continuously determine the CO emissions from the melt-shop equipment. The applicant may petition the District Supervisor to use an alternative method for parametrically monitoring the CO emissions. If this parametric monitoring method is reviewed, tested, and accepted by the District Supervisor, this system may be used in lieu of a continuous emission monitoring system. If the parametric monitoring system is not accepted, a continuous emissions monitoring system shall be installed within two years of plant start-up.

Except as provided in the above paragraph, the applicant shall monitor and record the CO emissions from the melt-shop equipment on a continuous basis in a manner and with instrumentation acceptable to the District Supervisor. Prior to installation, the applicant shall submit a monitoring plan to the District Supervisor for review and approval. The continuous emission monitoring system for CO, hereafter referred to as "CO CEMS", shall have dual

range capability, shall be installed, calibrated, maintained and operated in accordance with the procedures set forth in 40 CFR 60.13 and Performance Specification 4A (PS 4A), of Appendix B, 40 CFR Part 60. The span value shall be 2.0 times the lowest emission standard or as specified in the Federal regulations. No less than 30 days prior to the performance specification testing, a complete test plan must be submitted to the District Supervisor. The final plan must have approval prior to the testing. The applicant shall submit to the District Supervisor within 30 days of receipt, 2 copies of the final report demonstrating the CO CEMS complies with the requirements of PS 4A. In accordance with 40 CFR Parts 60.7 (c) and (d) an excess emissions report (EER) and Summary report shall be submitted in an acceptable format to the District Supervisor within 30 days following the end of each calendar quarter. The EER shall include all occurrences of excursions and the magnitudes of the excess emissions of the specified permit limit, the cause of the excess emissions, if known, periods of monitor downtime, any corrective action taken and the total operating time of the source(s). If no exceedances or CO CEMS downtime occurred during the reporting period the applicant shall report that fact. The Applicant shall perform and report the Quality Assurance Procedures of the CO CEMS as set forth in Appendix F of 40 CFR Part 60. Each quarter the results shall be presented and submitted in the format of the data assessment report (DAR) along with the quarterly EER and summary reports. Further, all monitoring data shall be kept on file for a period of at least 2 years and made available to the District Supervisor upon request.

32. Applicant shall monitor and record the visible emissions, as opacity, from the melt-shop equipment that passes through the baghouse in a manner acceptable to the District Supervisor and in compliance with 40 CFR 60.273a.

If a continuous opacity monitoring system is chosen, then prior to installation, applicant shall submit a Monitoring Plan to the District Supervisor for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required monitor(s). The continuous opacity monitoring system, hereafter referred to as "COMS", shall be installed, calibrated, maintained and operated in accordance with the procedures set forth in 40 CFR 60.13 and Performance Specification 1 (PS 1) of Appendix B, 40 CFR Part 60. The span value shall be 2.0 times the lowest emission standard or as specified in the federal regulations. No less than 30 days prior to the performance specification testing of the COMS, a complete test plan must be submitted to the District Supervisor. The final test plan must have approval prior to the testing. Applicant shall submit to the District Supervisor within 30 days of completion, 2 copies of the final report demonstrating the COMS complies with the requirements of PS1. In accordance with 40 CFR Parts 60.7(c) and (d), applicant shall submit a written excess emission report (EER) and summary report in an acceptable format to the District Supervisor within 30 days of the end of each calendar quarter. The EER shall include the magnitude, in actual percent opacity, of each six minute average of opacity greater than the permit limit and the time period represented by such averages. It shall also include the cause of the excess emission, if known, periods of COMS downtime, any corrective action taken, and total operating time of the source(s). If no exceedances or COMS downtime occurred during the time period, applicant shall report that fact. Applicant shall perform an annual audit of the COMS using the procedures set forth in U.S. EPA publication No. 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", and all amendments thereto. The results of the annual audit shall be submitted to the District Supervisor within 30 days of completion. Further, all monitoring data shall be kept on file for a period of at least 2 years and made available to the District Supervisor upon request.

If opacity is read with a certified visible emissions observer, applicant shall submit a Monitoring Plan to the District Supervisor for review and approval that describes compliance with 40 CFR 60.273a(c).

33. Within one year of plant start-up, the applicant shall implement a system to continuously determine the VOCs emissions from the melt-shop equipment. The applicant may petition the District Supervisor to use an alternative method for parametrically monitoring the VOCs emissions. If this parametric monitoring method is reviewed, tested, and accepted by the District Supervisor, this system may be used in lieu of a continuous emission monitoring system. If the parametric monitoring system is not accepted, a continuous emissions monitoring system shall be installed within two years of plant start-up.

Except as provided in the above paragraph, the applicant shall monitor and record the output of the total VOCs emissions from the melt-shop equipment in pounds per hour on a continuous basis in a manner and with instrumentation acceptable to the District Supervisor. Prior to installation, the applicant shall submit a Monitoring Plan to the District Supervisor for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required monitor(s). The continuous emission monitoring system, hereafter referred to as "VOCs CEMS", shall be installed, calibrated, maintained and operated in accordance with the procedures set forth in Performance Specifications for Continuous Emission Monitoring of Hydrocarbons, US EPA Publication No. EPA/530-SW-91-010 and Performance Specification 6 (PS 6) of 40 CFR 60, Appendix B. The span value shall be 2.0 times the lowest emission standard. No less than 30 days prior to testing, a complete protocol for the VOCs CEMS testing shall be submitted to the District Supervisor for approval. Within 30 days of completion of the VOCs CEMS performance specification, quarterly or annual testing the applicant shall submit the final report demonstrating the VOCs CEMS complies with the requirements of US EPA Publication EPA/530-SW-91-010 and PS6. In accordance with 40 CFR 60.7 (c) and (d) an excess emission report (EER) and summary report shall be submitted in an acceptable format to the District Supervisor, within 30 days of the end of each calendar quarter. The EER shall include all occurrences of excursions and the magnitudes of the excess emissions of the specified permit limit, the cause of the excess emissions, if known, periods of monitor downtime, any corrective action taken and the total operating time of the source(s). If no exceedances or VOCs CEMS downtime occurred during the reporting period the applicant shall report that fact. The Applicant shall perform and report the quality assurance procedures of the VOCs CEMS set forth in US EPA Publication EPA/530-SW-91-010 and conduct an annual relative accuracy test audit of the VOCs CEMS following procedures of PS6. The results shall be presented and submitted along with the quarterly EER and Summary report. Further, all monitoring data shall be kept on file for a period of at least 2 years and made available upon request.

If VOCs CEMS are required, the applicant shall continuously monitor the exhaust gas flow rate in the location of the VOCs CEMS unit(s). Monthly monitoring reports shall be kept on file for a period of at least two years and made available to the District Supervisor upon request.

34. Applicant shall not operate the melt-shop equipment unless the melt-shop baghouse is installed and operating properly.
35. Applicant shall not operate the EAF unless the natural gas-fired burners are installed and operating properly.

36. Applicant shall not operate the ladle dump station, tundish dump, alloy system and lime silo unless their respective baghouses are installed and operating properly.
37. Applicant shall not operate the facility unless a Scrap Management Program and Scrap Management Program Training Manual, as approved by the District Supervisor, is implemented and maintained. This program must be designed to prevent receipt of material(s), including radioactive scrap metal, that would result in emissions greater than that allowed by this permit.
38. Applicant shall not operate the grinding process unless its respective baghouse is installed and operating properly.
39. The NO₂ emission rate from the boiler shall not exceed 0.083 pound per MMBtu heat input, nor 1.5 pounds per hour.
40. Monitoring and recording of emissions and operating information is required to comply with the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A, AAa, and Dc. All source emissions data and operating data shall be kept on file for a period of at least two years and made available to the District Supervisor upon request.
41. Rules 1001, 1003 and 1004 - Verification of NO₂ emission rates from the boiler by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing and a complete report of test results must be submitted to the District Supervisor within 60 days following the last date of testing.

MISCELLANEOUS

42. Visible emissions from the roadways shall not exceed a 6-minute average of 5% opacity.
43. Visible emissions from all of the slag handling operations, excluding unloading dump trucks, and the material storage piles shall not exceed a 6-minute average of 10% opacity.
44. Rules 1001, 1003 and 1004 - Verification of visible emissions emission rates from the slag handling operations by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the District Supervisor. The final plan must be approved by the District Supervisor prior to testing and a complete report of test results must be submitted to the District Supervisor within 60 days following the last date of testing.
45. Applicant shall not operate the facility unless a fugitive dust control program, as approved by the District Supervisor, is implemented and maintained. This program must be designed to limit all fugitive dust emissions from the roadways, the material storage piles, the stock pile areas, and all of the slag material operations throughout the plant.

46. Applicant shall not operate the equipment covered by this application unless all of the requirements of 40 CFR 52.21, the federal Prevention of Significant Deterioration rules and regulations, are being met. This permit is issued pursuant to the determination that the equipment covered by this application will comply with all of the requirements under these rules and regulations.
47. Applicant shall restrict all roadways and easements on the proposed property to company representatives only, by placing gateways and other barriers that will limit access to the public.
48. The exhaust gases from the following equipment shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters and minimum heights as specified below:

<u>Source Description</u>	<u>Stack Height (feet)</u>	<u>Stack Diameter (inches)</u>
Melt-Shop Equipment	120	144
Reheat Furnace	60	32
Boiler	110	18

49. Applicant shall monitor and record the pressure drop across the melt-shop baghouse in a manner and with instrumentation approved in writing by the District Supervisor. The pressure drop across the baghouse shall be that recommended by its manufacturer. All such records shall be kept on file for a period of at least five years and made available to the District Supervisor upon request.
50. The applicant shall not operate the melt-shop equipment vented through the melt-shop baghouse unless a written air pollution control technology malfunction abatement plan and maintenance procedures and schedules, as approved by the District Supervisor, has been implemented. The malfunction abatement plan shall include a description of operating procedures and good air pollution control practices to be taken for minimizing emissions of air pollutants during a malfunction.
51. Within 12 months after commencement of trial operation, the applicant shall conduct an assessment of the impact of mercury emissions from the facility on the nearby Mott Lake Watershed. This assessment shall be conducted in accordance with a protocol approved by the Department. This assessment shall not be required if the testing conducted pursuant to Condition No. 27 of this permit reveals that the emissions of mercury from the facility are less than or equal to 0.0004 pound per hour and Condition No. 25 of this permit is revised to limit the emissions of mercury from the facility to less than or equal to 0.0004 pound per hour. The limitation of 0.0004 pound per hour is based on a stack air flow of 347,541 dry standard cubic feet per minute and a mercury stack concentration of 0.31 microgram per dry standard cubic meter. The revision of the mercury limitation to less than or equal to 0.0004 pound per hour shall become effective upon written request from the applicant.