

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Gerdau Special Steel North America - Jackson Mill	SRN : B4306
Location : 3100 BROOKLYN RD	District : Jackson
	County : JACKSON
City : JACKSON State: MI Zip Code : 49203	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Mike Kovalchick
FCE Begin Date : 10/1/2016	FCE Completion Date : 6/4/2018
Comments : Company out of compliance with torch cutting process(Rule 201), slag handling (Rule 201), open burning (Rule 310), improper operation of ventilation system to EAF, improperly conducting visible emission observations and issue with 2014 mercury test report	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/31/2018	Scheduled Inspection	Non Compliance	Inspection of Gerdau and adjacent TMS International Corporation slag handling facility.
05/07/2018	ROP Other	Compliance	1st Quarter CO CEMS Excess Emission Report, 1st Quarter SO2 CEMS Excess Emission Report; 1st Quarter Opacity Excess Emission Report. Higher than normal CO CEMS downtime of 37.3 hours due to monitor equipment malfunctions. (2.36% of total time almost all between 2/12 and 2/13/18. Company provided details response of incident.)
04/02/2018	MAERS	Compliance	ROP Cert received 3-15-18. MAERS reviewed. 1300% increase in NOx/VOC emissions from electric arc furnaces based on 2014 stack report. Previous year probably used emission factors. Despite increase in reported emissions, no issue with emission limits. No other issue with MAERS report.
04/02/2018	ROP Other	Compliance	2017 HAPs File (Attachment in MAERS Report)
04/02/2018	ROP Annual Cert	Compliance	Company failed to do daily VE readings on 7 days during the second half of the year. Compliance plan to address this appears to be acceptable. Company currently back into compliance with this requirement.

Activity Date	Activity Type	Compliance Status	Comments
04/02/2018	ROP SEMI 2 CERT	Compliance	Company failed to do daily VE readings on 7 days. Compliance plan to address this appears to be acceptable. Company currently back into compliance with this requirement.
04/02/2018	ROP Other	Compliance	3rd and 4th Quarter CEMs EER Reports (CO and SO2); SEMI 1 Deviations Report, 2nd half area source Reduction Report. No CO/SO2 emission exceedances with only few hours of CEMs downtime.
02/12/2018	MACT (Part 63)	Compliance	Subpart YYYYYY. Note. 2 Canadian suppliers not part of National US program but have site specific mercury reduction programs in place.
02/12/2018	Excess Emissions (CEM)	Compliance	4th Quarter 2017 Continuous Emission Monitoring System (CEMs) Excessive Emissions Reports (EER), CO and SO2. No exceedances of CO or SO2. Very small amount of monitor downtime due to calibrations.
01/24/2018	Scheduled Inspection	Non Compliance	Inspection of Gerdau and adjacent TMI International Corporation slag handling facility.
01/02/2018	ROP Other	Compliance	CERMS RATA Test Protocol for #3 Baghouse exhaust
01/02/2018	ROP Other	Compliance	CEMS RATA Test report for FG-EAF/LMF/VAD Fume Collection System for flow rate, SO2 and Co monitors. Monitors in compliance at maximum operating conditions.
01/02/2018	ROP Other	Compliance	CEMS report for 3rd Quarter 2017. Zero exceedances of CO/SO2 emission limits.
09/20/2017	ROP Semi 1 Cert	Compliance	No deviations reported.
09/20/2017	ROP Other	Compliance	1st Quarter CEMS EER Reports, 2nd Quarter CEMs EER Reports, 1st Half Area Source Reduction Report. Around 5 hours of CEMS down time for CO/SO2 CEMS each quarter but no excess emissions reported.
08/07/2017	ROP Other	Compliance	2nd Quarter 2017 Continuous Emission Monitoring System (CEMS) Excessive Emissions Reports (EER). No emission exceedances and only minor monitor downtimes due to calibration.

Activity Date	Activity Type	Compliance Status	Comments
08/07/2017	MACT (Part 63)	Compliance	Subpart YYYYY, Electric Arc Furnace Steelmaking Facilities. Company noted that they didn't purchase any scrap from Canadian scrap supplies that are not part of the National Vehicle Mercury Recovery Program.
07/17/2017	ROP Other	Compliance	EAF Baghouse dust analyses for April 2017. It is a PSD permit requirement to test for Pb, Mn and Hg from Baghouse 3.
05/15/2017	MAERS	Compliance	Emissions from EUSCRAPMETAL determined by Company via CEMs and stack test and results acceptable. Production appears to be down 15% from previous year which resulted in a similar drop in emissions. 6 emergency generators were added. They should be checked for RICE MACT compliance during next inspection. Highest pollutant was CO at 427 tons. No other findings
05/04/2017	ROP Other	Compliance	EAF baghouse analyses for January 2017. 2.43 mg/kg Mercury. 4940 mg/kg lead, 28,000 mg/kg Manganese, 210,000 mg/kg Zinc. There appears to be no specific limit in ROP; just that they do the analysis.
05/03/2017	ROP Qrtly Cert	Compliance	1st Quarter 2017 Continuous Emission Monitoring System (CEMS) Excessive Emissions Reports (EER). There was no deviations and only 5 hours of monitor down time.
03/28/2017	ROP Other	Compliance	2016 MAERS Cert
03/28/2017	ROP Annual Cert	Compliance	1 deviation reported. It was previously reported to Staff on August 01, 2016. It was an exceedance of SO2 lbs/ton limit in their permit. 1.13 lbs SO2/ton steel charged. Limit was one. It appeared to be an isolated incident aggravated by mechanical failure at caster. It had happened once before in June of 2014. Inspection by staff on 7/28/2016 found no compliance issues.
03/28/2017	ROP SEMI 2 CERT	Compliance	No deviations. Staff conducted inspection on 7/28/2016 which no compliance issues so consistent with report of only 1 deviation which occurred after inspection was conducted.

Activity Date	Activity Type	Compliance Status	Comments
03/28/2017	ROP Other	Compliance	3rd Quarter CEMs EER Reports, 4th Quarter CEMs EER Reports, 2nd Half Area Source Reduction Report, 2016 ROP Compliance Report Table
03/28/2017	ROP Other	Compliance	3rd Quarter 2016 Continuous Emission Monitoring System (CEMs) Excessive Emissions Reports (EER). No deviations.
03/28/2017	ROP Other	Compliance	40 CFR 63 YYYYY Semiannual Mercury Compliance Report. No deviations. Company purchase scrap from suppliers that participate in the National Vehicle Mercury Switch Recovery Program
03/28/2017	ROP Other	Compliance	EAF Baghouse dust analyses for January 2017. It is a PSD permit requirement to test for Pb, Mn and Hg.
03/21/2017	ROP Other	Compliance	4th Quarter 2016 Continuous Emission Monitoring System (CEMs) Excessive Emissions Reports (EER). No deviations.
01/31/2017	ROP Other	Compliance	Continuous Emission Monitoring System (CEMs). Excessive Emissions Reports (EER) (Note: 8.5 hours of CEM monitor downtime noted or 0.63% of the time.)
01/11/2017	ROP Other	Compliance	CEMS RATA test report for the #3 baghouse exhaust associated with FG-EAF/LMF/VAD. The testing was conducted in accordance with the approved test protocol and the facility was operated in compliance with the permit conditions or at the maximum routine operating conditions for the facility.
12/19/2016	ROP Other	Compliance	EAF baghouse analyses for October 2016. 1.95 mg/kg Mercury. 8280 mg/kg lead, 41400 mg/kg Manganese, 136000 mg/kg Zinc. There appears to be no specific limit in ROP; just that they do the analysis.

Activity Date	Activity Type	Compliance Status	Comments
10/31/2016	ROP Other	Compliance	3rd Quarter 2016 Continuous Emission Monitoring System (CEMs) Excessive Emissions. 24 hours worth of SO2 emission limit violations. Cause was addressed. Emission exceedance went on for last than 7 days so no HPV; no obvious reason for Violation Notice. This isn't a regular occurrence having last occurred in June 2016.
10/25/2016	ROP Semi 1 Cert	Compliance	
10/25/2016	ROP Other	Compliance	1st Quarter CEMS EER Reports, 2nd Quarter CEMS EER Reports, 1st Half Area Source Reduction Report.
10/25/2016	ROP Other	Compliance	CEMS RATA test protocol for the #3 baghouse exhaust associated with FG-EAF/LMF/VAD. The testing will be conducted in accordance with the enclosed test protocol and the facility will be operated in compliance with the permit conditions or at the maximum routine operating conditions for the facility.

Name: M. Kovaladick / mt Date: 6-5-18

Supervisor: 