

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

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|--|---|
| <b>Facility :</b> Gerdau Special Steel North America - Jackson Mill  | <b>SRN :</b> B4306                        |
| <b>Location :</b> 3100 BROOKLYN RD   | <b>District :</b> Jackson                 |
|  | <b>County :</b> JACKSON                   |
| <b>City :</b> JACKSON <b>State:</b> MI <b>Zip Code :</b> 49203   | <b>Compliance Status :</b> Non Compliance |
| <b>Source Class :</b> MAJOR  | <b>Staff :</b> Mike Kovalchick            |
| <b>FCE Begin Date :</b> 10/1/2018  | <b>FCE Completion Date :</b> 9/24/2019    |
| <b>Comments :</b> Current non-compliance issues including open burning of waste materials associated with the outdoor slag pile and excess opacity coming from a small vent pipe associated with an oil misting process. |   |

**List of Partial Compliance Evaluations :**

| Activity Date | Activity Type        | Compliance Status | Comments  |
|---------------|----------------------|-------------------|---|
| 09/05/2019    | Scheduled Inspection | Non Compliance    | FCE. Non-compliance issues include placing waste such as pallets into slag pile and allowing to burn outdoors which is repeat violation from 2018. Also, small vent from oil mist process associated with the castor showed some opacity. |
| 09/04/2019    | MACT (Part 63)       | Compliance        | Subpart YYYYY Semiannual Mercury Compliance Report. They did not purchase auto scrap from any company not part of national vehicle mercury switch recovery program.   |
| 09/04/2019    | ROP Qrtly Cert       | Compliance        | 2nd Quarter CO EER Report, 2nd Quarter SO2 EER Report, 2nd Quarter QCGA. 5 hours of CO CEM downtime and 5 hours of SO2 CEM downtime.  |

| Activity Date | Activity Type          | Compliance Status | Comments   |
|---------------|------------------------|-------------------|--|
| 06/05/2019    | ROP Other              | Compliance        | 2018 MAERS ROP Cert; 2018 HAPs File (Attachment in MAERS Report) Some increase in steel production compared to previous year which resulted in increased emission. Company provided spreadsheet of all emissions unit showing how they estimates emissions. They used a combination of emission factors, CEMS and stack test data combined with production data to come up with emission estimates. Emission estimate methods appear to be sound. CO emissions came in at 672 tons. Per Order with EPA, they estimated a new baghouse/stack to control the formerly uncontrolled castor monitor vent. No concerns. |
| 05/14/2019    | ROP Other              | Compliance        | 1st Quarter 2019 Continuous Emission Monitoring System (CEMs) Excessive Emission Reports (EER). No CO or SO2 emission exceedances. Only 7 hours of monitor downtime.   |
| 04/12/2019    | ROP Annual Cert        | Compliance        | Daily VE readings not done on a number of days due to untrained employees.   |
| 04/12/2019    | ROP SEMI 2 CERT        | Compliance        | Daily VE readings not done on a number of days due to untrained employees.   |
| 04/12/2019    | Excess Emissions (CEM) | Compliance        | 3rd and 4th Quarter CEMs EER Reports (CO and SO2). Showed no exceedances.  |
| 04/12/2019    | MACT (Part 63)         | Compliance        | Subpart YYYYYY. Mercury switches are being handled properly.   |
| 02/25/2019    | Excess Emissions (CEM) | Compliance        | No CO or SO2 emission violations. 7 hours of CO CEMs downtime and 7.5 hours of SO2 CEMs downtime.  |
| 02/25/2019    | CEM RATA               | Compliance        | RATA test for CERMS on Baghouse #3. Showed compliance at maximum routine operating conditions. RATA was performed on CO and S02 CEMS.  |
| 11/19/2018    | ROP Other              | Compliance        | 3rd Quarter 2018 Continuous Emission Monitoring System (CEMs) Excessive Emissions Reports (EER). No emissions exceedances(CO and SO2) and very low monitor down times.   |

Name:

M. Kovalchuk

Date:

7/24/2019

Supervisor:

[Signature]  
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