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MDEQ - JACKSON

JUN 20 2018

AIR QUALITY DIVISION

Michael J. Connolly
Director Environmental Engineering

June 19, 2018

Mike Kovalchick, Senior Environmental Engineer
Air Quality Division
Michigan Department of Environmental Quality
Jackson District Office
301 East Louis Glick Highway
Jackson, MI 49201-1556

Subject: TMS International @ Gerdau Monroe - Violation Notice (May 30, 2018)
ROP No: MI-ROP-B7061-2016
PTI No: MI-PTI-B7061-2016

Dear Mr. Kovalchick,

TMS International (TMS) received the referenced Violation Notice (NOV) regarding need for a PTI for an existing permitted source and has prepared the following response. On October 4, 2016, Michael Connolly, Director of Environmental Engineering for TMS, was contacted via telephone by Eric Grinstern, MDEQ Inspector, stating he just inspected the TMS site and he is now changing his position that we have portable torch cutting on a non-production basis and wants TMS to submit a permit to install (PTI) application.

He explained that non-production under MDEQ R 336.1285 PTI Exemptions, relates more to maintenance activity. TMS stated that we call the torch cutting non-production since it is dependent on reject steel and the material we receive is not manufactured to be cut into scrap, therefore it is not a normal production process for Gerdau and should be considered non-production and Eric Grinstern commented our operation is more on a production basis as opposed to cutting for maintenance. He disagreed with the portable torch concept for our process and he stated our track torch is more permanent compared to a handheld torch which he thought is normally portable. At that time Eric Grinstern provided web links to assist in preparing the air PTI application. Shortly thereafter on December 1, 2016, Gerdau and TMS International (p/k/a Tube City IMS) were granted the above referenced ROP and PTI.

This ROP/ PTI states this is a Source-Wide Permit to Install (PTI) and is issued in accordance with the Michigan Air Pollution Control Rule and constitutes a federally enforceable PTI. The ROP/PTI discusses if the process is reconstructed, relocated or modified a PTI is required. The ROP/PTI specifies scrap cutting as a permitted source. EUSCRAPCUT is identified as an emission unit under Flexible Group ID FGPLANTPROC and specifies in Section 2.D.III.2, for EUSCRAPCUT submit a BMP plan for torch cutting within 60 days. The Scrap Cutting BMP was submitted on

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January 30, 2017 (see attachment). If there were any other requirements associated with the EUSCRAPCUT, such as a need to submit a PTI, we expected MDEQ would specify this requirement in the ROP/PTI when they issued the permit in December 2016.

TMS also submitted EUSCRAPCUT, EU-101 MAERS annual emission reports for the scrap cutting in 2017 (see attachment). TMS had previously submitted an ROP application in September of 2015 which included calculations and the relevant forms for the scrap cutting operation (see attachment). The ROP application included E-101 forms for EUSCRAPCUT (see attachment). TMS believed that no PTI was required once the scrap cutting operation was included in the ROP/PTI. The calculations for the ROP application included torch cutting using four torch tips and a maximum yearly throughput of 72,000 tons which are still applicable. Again, we would have expected MDEQ to have notified us that the reports we were filing based on the previously exempt activities needed to be addressed differently despite their being included in the new permit.

TMS believes the Scrap Cutting is fully permitted under ROP # MI-ROP-B7061-2016 and PTI No: MI-PTI-B7061-2016 and therefore would not require a PTI due to the fact that the ROP is for four torch tips and 72,000 tons annual production and the scrap cutting machine has four torch tips and is under the same production limit.

TMS would have appreciated being notified of MDEQ's position and have met with us to explain its rationale rather than issuing an NOV. We request that this NOV be withdrawn and a meeting be scheduled so TMS and MDEQ can review MDEQ's reasoning and expected submittals to become fully compliant, such as Title V applicability for TMS International, other opportunities to be fully compliant with Air Quality rules and regulations including Scrap Cutting permit exemption opportunities found in MDEQ R336.1285 or R336.1290,

We appreciate follow-up at your earliest convenience and an opportunity to meet and exchange information which may expedite subsequent steps. Please contact me at 215-956-5618 or MConnolly@tmsinternational.com should you have any questions or require additional information.

Sincerely,


Michael Connolly

Attachments:

Cc: Craig Metzger, Gerdau
Scott Miller, MDEQ, Jackson Office



Joseph L. Thomas, EIT
Environmental Department

January 30, 2017

District Supervisor
Michigan Department of Environmental Quality, AOD
Jackson District Office
301 Louis Glick Hwy.
Jackson, Michigan 49201.

Attention: Eric Grinstern

Subject: TMS International @ Gerdau Monroe Scrap Cutting BMP's

Dear Mr. Grinstern

TMS International is pleased to submit the enclosed Scrap Cutting BMP as stipulated in Section 2, Condition D.III.2 in the Renewable Operating Permit No. MI-ROP-B7061-2016 that was effective December 1, 2016. The enclosed BMP for the EUSCRAPCUT emission unit has been prepared according to Michigan R 336.1213(3).

Please contact me at 215-956-5538 or josephthomas@tmsinternational.com should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Joseph L. Thomas". The signature is written in a cursive style with a long, sweeping underline.

Joseph L. Thomas

Enclosure:

Cc: Craig Metzger, Gerdau – Monroe
Tom Eten, TMS International at Gerdau – Monroe
Michael Connolly, TMS International

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**TMS International, LLC at
Gerdau Monroe, MI
3000 East Front Street
Monroe, MI 48161**

**Scrap Cutting
Best Management Practices (BMP)
Emission Unit: EUSCRAPCUT**

Renewable Operating Permit: MI-ROP-B7061-2016

State Registration No. B7061

January 30, 2017

Revision: 0

I. INTRODUCTION

TMS International, LLC (TMS) is an onsite contractor at the Gerdau facility in Monroe, Michigan. Services provided by TMS include slag pit digging, slag processing and sorting including metal recovery, scrap drop balling, and scrap torch cutting. Condition 2.D.III.2 of the Renewable Operating Permit No. MI-ROP-B7061-2016 (ROP) requires the creation of a BMP for the emission unit EUSCRAPCUT and has been prepared according to Michigan R 336.1213(3).

II. SCRAP CUTTING BMP

A. Testing and Monitoring

According to ROP Section 2.D.VI.1, “*the permittee shall keep, in a satisfactory manner, daily records of dust control activities for FGPLANTPROC*” and ROP Section 2.D.VI.2, “*the permittee shall perform a non-certified visible emission observation of the fugitive dust source at least 5 days per week, excluding non-operating days, during March through October.*” This BMP has been designed to use periodic monitoring that is sufficient to yield reliable data from the relevant time period that are representative of the stationary source’s compliance with the permit. There are 6 emission units covered by the ROP: EUSLAGPLANT, EUDROBALL, EUROADS, EUSLAGPIT, EUSTOCKPILES, and EUSCRAPCUT. This plan addresses the BMP and visible emission observation requirements for EUSCRAPCUT.

To comply with the above requirements TMS has developed a visible emission form (Scrap Cutting Emission Observation Form) attached which will be used observing dust control activities and observation of visible emissions on a daily basis for scrap cutting activities. The completed forms will be retained onsite for MDEQ inspection for 5 years as per the record retention condition of the ROP. Visible emission observations will be reported to MDEQ every 6 months due

March 15 for the July 1 through December 31 period; and September 15 for the January 1 through June 30 period.

B. Corrective Actions

If during the initial observation according to Section A of this BMP emissions in excess of 20% (ROP Condition 2.A.11) at any time during the observation a corrective action will be conducted. Corrective actions that can be applied to the automated torch cutting machine include (but not limited to): cleaning beds of scrap or slag left behind during previous cutting operations; changing the position or height between the torches and the scrap to be cut; changing the gas flow to the torch; slowing the cutting pace of the machine; stop cutting and examine the scrap to determine if there is a better place to perform the cut.

Once the corrective action has been conducted and noted on the observation form, cutting will resume while observation continues to assure that the corrective action was successful. If it was not successful, another corrective action will be performed. It is important to implement corrective action as soon as opacity above 20% is seen, as opposed to observing for a 6-minute average; this avoids exceeding the 6-minute average as set forth in the ROP.

C. Reporting

Visual observations will be summarized in a semi-annual report (ROP Condition 2.D.VII.2) and be certified by a responsible person and submitted to MDEQ every March 15 for the reporting period July 1 through December 31, and September 15 for the reporting period January 1 through June 30. In addition to the required semi-annual reports, any deviations will be promptly reported as per Michigan R 336.1912 (within 2 business days).

D. Attachment – Scrap Cutting Observation Form

FUGITIVE DUST CONTROL ACTIVITIES & VISIBLE EMISSIONS FORM
 TMS International at Gerdau - Monroe, Michigan prepared in accordance with Section 2.D III.1 and 2, and Appendix 3-2
 Renewable Operating Permit No. MI-ROP-B7061-2D16

Month: _____

EU: CIRCLE ONE EUSLAGPLANT EUSLAGPIT EUROADS EUSTOCKPILES EUSCRAPCUT EUDROPBALL

Day	Observer Initials	DUST CONTROL ACTIVITIES	Time (start/stop)	EMISSIONS OBSERVED (Yes, No)	CORRECTIVE ACTIONS	EMISSIONS OBSERVED AFTER CORRECTIVE ACTIONS? (Yes, No)	NOTES / COMMENTS (no dust, rained, etc.)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
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21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							

- Notes:
1. EUSLAGPLANT crusher opacity limit is 15% over a 15 minute average (slag crusher)
 2. EUDROPBALL, EUSLAGPIT, and remainder of EUSLAGPLANT opacity limit is 10% over a 15 minute average (belts, conveyors, screens, and all conveyor and belt transfer points)
 3. EUROADS and EUSTOCKPILES opacity limit is 5% over a 3 minute average (any road, lot, storage pile, or material handling activity at a storage pile)
 4. EUSCRAPCUT opacity limit is 20% over 6 minute average except for one 6 minute average per hour no more than 27%



Michigan Department of Environmental Quality - Air Quality Division
Michigan Air Emissions Reporting System (MAERS)
E-101 EMISSIONS

1. INVENTORY YEAR
2014 pg 1 of 3

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

GENERAL INSTRUCTIONS: Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report each activity's emissions for a specific inventory year. Enter the specific inventory year in field 1.

FORM REFERENCE			
2. Form Type E-101	3. AQD Source ID (SRN) N1675	4. Emission Unit (EU) OR Reporting Group (RG) ID EU SCRAP CUT - 01	
5. Source Classification Code (SCC) 3-03-009-29		6. Material Code 29583	

EMISSION INFORMATION				<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code PM		7B. Annual Emissions 2,262 Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent			
11. Comment The PM emission factor is based on "Metal Cutting Operations: Emission Factors for Particulates, Metals and Metal Ions" Bhaskar Kura, et. al. (Study) (SEE AI-SCRAP CUTTING)						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code PM-10		7B. Annual Emissions 2,194 Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent			
11. Comment The PM emission factor is based on "Metal Cutting Operations: Emission Factors for Particulates, Metals and Metal Ions" Bhaskar Kura, et. al. (Study) (SEE AI-SCRAP CUTTING)						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code PM-2.5		7B. Annual Emissions 1,906 Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent			
11. Comment The PM emission factor is based on "Metal Cutting Operations: Emission Factors for Particulates, Metals and Metal Ions" Bhaskar Kura, et. al. (Study) (SEE AI-SCRAP CUTTING)						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code S02		7B. Annual Emissions 0.54 Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent			
11. Comment SO2, CO, VOC, NO2, CO2, AND CH4 EMISSIONS BASED ON FUEL COMPOSITION (SEE AI-SCRAP CUTTING)						



Michigan Department of Environmental Quality - Air Quality Division
Michigan Air Emissions Reporting System (MAERS)
E-101 EMISSIONS

1. INVENTORY YEAR
2014 pg 2 of 3

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GENERAL INSTRUCTIONS: Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report each activity's emissions for a specific inventory year. Enter the specific inventory year in field 1.

FORM REFERENCE			
2. Form Type E-101	3. AQD Source ID (SRN) N1675	4. Emission Unit (EU) OR Reporting Group (RG) ID EU SCRAP CUT - 01	
5. Source Classification Code (SCC) 3-03-009-29		6. Material Code 29583	

EMISSION INFORMATION		<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code CO		7B. Annual Emissions 225 Pounds		
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)				
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent	
11. Comment SO2, CO, VOC, NO2, CO2, AND CH4 EMISSIONS BASED ON FUEL COMPOSITION (SEE A1-SCRAP CUTTING)				

EMISSION INFORMATION		<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code VOC		7B. Annual Emissions 30 Pounds		
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)				
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent	
11. Comment SO2, CO, VOC, NO2, CO2, AND CH4 EMISSIONS BASED ON FUEL COMPOSITION (SEE A1-SCRAP CUTTING)				

EMISSION INFORMATION		<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code NO2		7B. Annual Emissions 27 Pounds		
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)				
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent	
11. Comment SO2, CO, VOC, NO2, CO2, AND CH4 EMISSIONS BASED ON FUEL COMPOSITION (SEE A1-SCRAP CUTTING)				

EMISSION INFORMATION		<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code CO2		7B. Annual Emissions 375,300 Pounds		
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)				
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent	
11. Comment SO2, CO, VOC, NO2, CO2, AND CH4 EMISSIONS BASED ON FUEL COMPOSITION (SEE A1-SCRAP CUTTING)				



Michigan Department of Environmental Quality - Air Quality Division
Michigan Air Emissions Reporting System (MAERS)
E-101 EMISSIONS

1. INVENTORY YEAR
2014 pg 3 of 3

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GENERAL INSTRUCTIONS: Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report each activity's emissions for a specific inventory year. Enter the specific inventory year in field 1.

FORM REFERENCE			
2. Form Type E-101	3. AQD Source ID (SRN) N1675	4. Emission Unit (EU) OR Reporting Group (RG) ID EU SCRAP CUT - 01	
5. Source Classification Code (SCC) 3-03-009-29		6. Material Code 29583	

EMISSION INFORMATION				<input type="checkbox"/> Change	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code CH4		7B. Annual Emissions 6 Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor N/A	9B. Exponent N/A	9C. Emission Factor Unit Code N/A	10. Control Efficiency N/A Weight Percent			
11. Comment The PM emission factor is based on "Metal Cutting Operations: Emission Factors for Particulates, Metals and Metal Ions" Bhaskar Kura, et. al. (Study) (SEE AI-SCRAP CUTTING)						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				
		Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code	10. Control Efficiency			
			Weight Percent			
11. Comment						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				
		Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code	10. Control Efficiency			
			Weight Percent			
11. Comment						

EMISSION INFORMATION				<input type="checkbox"/> Change	<input type="checkbox"/> Add	<input type="checkbox"/> Delete
7A. Pollutant Code		7B. Annual Emissions				
		Pounds				
8. Emission Basis <input type="checkbox"/> CEM <input type="checkbox"/> Stack Test <input type="checkbox"/> PEM <input type="checkbox"/> Mass Balance <input type="checkbox"/> Tank Model <input type="checkbox"/> Landfill Model (Please check one) <input type="checkbox"/> MAERS Emission Factor <input checked="" type="checkbox"/> Other (Attach Description)						
9A. List Emission Factor	9B. Exponent	9C. Emission Factor Unit Code	10. Control Efficiency			
			Weight Percent			
11. Comment						

Y

537-89A

Y

A-101 ACTIVITY INFORMATION EU/RG ID EUSLAGPIT

Source Classification Code (SCC) 3-05-020-33
Preparer's SCC Comment Slag pit digging and dumping of molten slag

SEASONAL MATERIAL USAGE SCHEDULE

IF THROUGHPUT IS >0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%

OPERATING SCHEDULE

Winter (Dec,Jan,Feb)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)	Hours per Day	Days per Week	Days per Year	Hours/Year
25	25	25	25	24	7	22	528

MATERIAL INFORMATION

Material Code STONE Material Throughput 58120 Unit Code TON (ENGLISH - 2000 U.S. LBS)
 Preparer's material description Molten slag
 VOC Content Density BTUs (fuel) Sulfur Content (fuel) Ash Content (fuel)

E-101 EMISSION INFORMATION EU/RG ID EUSLAGPIT SCC Code 3-05-020-33

Pollutant Code	Annual Emissions	Unit code	Emission Basis	List Emission Factor	Exponent	Emission Factor Unit Code	Control Efficiency %	Comment
PM10,FLTRBLE	282	POUNDS	EPA EF	4.3	-3	TON (ENGLISH - 2000 U.S. LBS)		

ATTACHMENT FOR EU/RG ID EUSLAGPIT SCC Code 3-05-020-33

Document Name: TMS Monroe MAERS 2017

File Name: MI_Monroe RY 2017 Emissions.xls

EU-101 EMISSION UNIT INFORMATION

AQD Emission Unit ID	Emission Unit ID	NAICS Code	Remove from MAERS	Installation Date	Dismantle Date
EU0050	EUSCRAPCUT	562920	N	01/01/1989	
Preparer's Description	Large scrap pieces cut by either a torch or lance into smaller pieces				
Design Capacity	Design Capacity Unit Numerator	Design Capacity Unit Denominator	Maximum Namplate Capacity	Rule 201 Grandfathered?	Rule 201 Exempted?
				N	N

If Rule 201 exempt, Rule Number	If Rule 201 exempt, is throughput below reporting Thresholds?	Permit?	If Permitted, Permit Number	Is this Emission Unit required to report emissions to MAERS for this reporting year?
		Y	537-89A	Y

A-101 ACTIVITY INFORMATION EU/RG ID EUSCRAPCUT

Source Classification Code (SCC) 3-04-003-60
Preparer's SCC Comment Large scrap pieces cut by either a torch or lance into smaller pieces

SEASONAL MATERIAL USAGE SCHEDULE

IF THROUGHPUT IS >0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%

OPERATING SCHEDULE

Winter (Dec,Jan,Feb)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)	Hours per Day	Days per Week	Days per Year	Hours/Year
25	25	25	25	7	5	260	1820

MATERIAL INFORMATION

Material Code IRON
Material Throughput 46257
Unit Code TON (ENGLISH - 2000 U.S. LBS)
Preparer's material description Scrap pieces
VOC Content
Density
BTUs (fuel) 197.38 BRITISH THERMAL UNITS PER POUND
Sulfur Content (fuel)
Ash Content (fuel)

E-101 EMISSION INFORMATION EU/RG ID EUSCRAPCUT SCC Code 3-04-003-60

Pollutant Code	Annual Emissions	Unit code	Emission Basis	List Emission Factor	Exponent	Emission Factor Unit Code	Control Efficiency %	Comment
CO	125	POUNDS	EPA EF	7.5	0			
NOX	15	POUNDS	EPA EF	9	-1			
PM10,FLTRBLE	4271	POUNDS	EPA EF	2.04	0	TON (ENGLISH - 2000 U.S. LBS)		
PM2.5,PRIMRY	4143	POUNDS	Other	1.8	0			
SO2	0.3	POUNDS	EPA EF	1	-1			
VOC	17	POUNDS	EPA EF	1	0			

ATTACHMENT FOR EU/RG ID EUSCRAPCUT SCC Code 3-04-003-60

Document Name: TMS Monroe MAERS 2017

File Name: MI_Monroe RY 2017 Emissions.xls