DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A864036150

FACILITY: AK STEEL - DEARBORN WORKS		**SRN / ID:** A8640
LOCATION: 4001 MILLER ROAD, DEARBORN		**DISTRICT:** Detroit
CITY: DEARBORN		**COUNTY:** WAYNE
CONTACT: James E. Earl , Environmental Manager		**ACTIVITY DATE:** 08/03/2016
STAFF: Katherine Koster	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MEGASITE
SUBJECT: Machine scarfer, material handling, emergency generators, and fugitive dust		
RESOLVED COMPLAINTS:		

Reason for Inspection: Targeted Inspection
Level of Inspection: PCE
Inspected by: Katie Koster, AQD
Personnel Present: Jim Earl, Environmental Manager; Dave Pate, Environmental Engineer
Facility phone number: 313-323-1261
Facility fax number: 313-337-9395
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FACILITY BACKGROUND

AK Steel – Dearborn Works (formerly Severstal Dearborn, LLC) is an integrated iron and steel mill which primarily produces flat rolled coils. The facility is operating at 4001 Miller Road, Dearborn. The previous address, 3001 Miller Road, has been assigned to the Ford Motor Company Rouge Plant which is adjacent to the mill. The company was previously operating under the name Severstal Dearborn, LLC until it became AK Steel Dearborn Works in October 2014. Before being purchased by Severstal in 2004, the company was operating as Rouge Steel.

PROCESS DESCRIPTION
Below includes the processes discussed and/or observed during the inspection. This does not include the entire facility.

Machine scarfing is performed to remove surface defects from the steel slab. Manual scarfing is performed for touch up purposes and cutting and slicing is done manual to resize slabs.

Numerous emergency engines, both diesel fired and natural gas, are located throughout the facility to provide backup power in the event of an emergency.

Raw material handling, coal handling, and coke screening are all processes and equipment for receiving, preparing, and transporting raw materials to the blast furnace.

INSPECTION NARRATIVE
I arrived at the facility on August 3, 2016, around 9 a.m. and met with Mr. Dave Pate, Environmental Engineer, and Mr. Jim Earl, Environmental Manager. First, we went to the scarfing building. Tom Young, Maintenance Manager, accompanied us about the facility. Scarfing is performed by a contractor, SMS Mill Services. Unfortunately, it was a "down" day and no machine scarfing was scheduled to occur. Manual cutting and slicing were being performed inside of the building in the slab resizing area. I observed this activity which generated little to no emissions. Next, we moved to the automatic scarfing machine. According to Mr. Young, the machine cannot be operated unless the baghouse is in operation. The slab is scarfed on both sides and has to be flipped over outside of the booth. We went inside of the booth and viewed the torch, hoods and ductwork to the baghouse, and pits that collect the scarfing fines.

After scarfing, some slabs need manual touch up to remove fins created by the scarfing process.
This occurs in the building open area outside of the booth. About 30 slabs can be processed per shift; it takes about 5 minutes to scarf each side. The scarfing area is kept under negative process.

We walked outside and viewed the baghouse. There are 4 modules. According to Mr. Young, there are 360 bags per module. Bags in module #3 were just changed and the company is in the process of replacing all the bags on a one module per month schedule. The baghouse overall pressure drop was 11 inches H20. Although no

automatic scarfing was occurring, the baghouse runs continuously during the week. It is shut down on the weekends when no scarfing occurs. I recorded the following compressed air pressures for each module: 100, 90, 90, 110 bar.

The baghouse hoppers are emptied every day. I viewed the pressure drop gauges for each module. All five gauges (one for each module and overall pressure drop) were calibrated last month. No excess visible emissions from the baghouse stack have been observed by the certified visible emissions reader.

Next, we viewed the various generators around the plant. I recorded the following information from each generator:

- Hot dip: 216.7 hours on the meter. According to the operators, it is started ½ hour every Friday. It was installed 2011 and has a 3400 gallon diesel tank.
- Mill water: 128.6 hrs. on the meter. According to the operator, it is started up once every two weeks, and yearly maintenance is performed in October. It has a 4000 gallon diesel tank
- Bosh/stove gas engine pump: 122.6 hrs. on the meter, natural gas fired
- Tuyere system: 128.1 hrs. on the meter, natural gas fired
- Hearth/stove: 136.3 hrs. on the meter, natural gas fired
- One outside near the blast furnace: 150.3 hrs. on the meter, natural gas fired

All natural gas fired generators are started up once per month according to Mr. Andy Holcomb. Also, the natural gas generators have to be started up in order to access the hour meter.

We went into the coke screening building (EE). Coke is unloaded in the EE building by railcar. It is emptied from the bottom of the car through a grate into the basement and conveyed to the DD building. The basement of the EE building is under negative pressure and routed to the baghouse on the northeast side of the building. We drove around and viewed the raw material storage piles. I did not observe any excess fugitive dust. Note, there are no limestone piles as that material has been replaced by BOF slag.

Coal handling is managed through enclosed unloaded from pneumatic trucks into pulverized coal silos. I did not observe any visible emissions from the silos while on site.

We returned to the environmental offices where we discussed the fugitive dust requirements and facility presented records. According to Mr. Dave pate, the following fugitive dust activities are in place:
- Sweep and flush paved roads once per day; March through October
- Unpaved roads, treat every 12 days with asphalt emulsion petro tec
- Inactive storage piles – treat once per year
- Active storage piles – treat once per month; this included coke breeze and iron fines
- Parking lots – once per month

We viewed the records of the various visible emissions readings required and baghouse inspection records and discussed which records AQD would be requesting for the inspection. On August 5, I sent the attached records request.

RULES/PERMIT CONDITIONS EVALUATED

Fugitive dust conditions – Attached are sample records, procedures, and forms for the fugitive dust requirements. Based on this information, the facility is meeting the fugitive dust requirements which are summarized below. These requirements are contained in SIP CO 30-1993 and ROP MI-ROP-A8640-2016. Also, information required to be recorded (outlined in Appendix 1-4 of the ROP) appears to be in the records.
Active piles – once a month March through October
Inactive piles – treatment once per year
Access areas surrounding piles – once per month March – October
Open areas – once a month March – October
Unpaved roads – every 12 days, March – October
Paved roads – wet sweep daily
Parking areas – once per month, wet sweep
All paved roads – flusher daily, 5 days per week for 8 months of the year
Suppressant- acrylic cement, petroleum resin, or asphalt emulsion. 1 to 9 ratio with water, applied at a rate of 0.3 gallons per square yard

PTI 20-14 (issued 9/10/14)

The following conditions apply to: EUMACHSCARF
DESCRIPTION: One machine scarfer equipped with a robotic arm with an oxy-fuel torch to remove skin defects from the slab. This operation is enclosed and will be controlled by a baghouse.
POLLUTION CONTROL EQUIPMENT: Baghouse

I. EMISSION LIMITS

1. **IN COMPLIANCE. No VE exceedances have been noted by the contracted certified VE reader during scheduled observations or during the VE observations during the stack test.** Visible Emissions 5% opacity 6-minute average from EUMACHSCARF Baghouse stack

2. **IN COMPLIANCE. No VE exceedances have been noted by the contracted certified VE reader during scheduled observations or during the VE observations during the stack test.** Visible Emissions 25% opacity 1.5-minute average form EUMACHSCARF Baghouse stack

3. **IN COMPLIANCE. Stack test was performed on October 27, 2015 and results were 0.001 gr/dscf.** PM 0.003 gr/dscf from EUMACHSCARF Baghouse stack

4. **IN COMPLIANCE. Stack test was performed on October 27, 2015 and results were 0.001 gr/dscf.** PM10 0.005 gr/dscf from EUMACHSCARF Baghouse stack

5. **IN COMPLIANCE. Stack test was performed on October 27, 2015 and results were 1.00 lb/hr.** PM10 4.52 pph from EUMACHSCARF Baghouse stack

6. **IN COMPLIANCE. Stack test was performed on October 27, 2015 and results were 0.001 gr/dscf.** PM2.5 0.005 gr/dscf from EUMACHSCARF Baghouse stack

7. **IN COMPLIANCE. Stack test was performed on October 27, 2015 and results were 1.00 lb/hr.** PM2.5 4.52 pph from EUMACHSCARF Baghouse stack

II. MATERIAL LIMITS NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUMACHSCARF unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the baghouse, has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
   a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
   b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
   c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

   If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits

   IN COMPLIANCE - A MAP was submitted timely. Procedures related to a,b, and c above are referenced in the MAP. AQD will review the referenced procedures during the next inspection cycle to ensure they contain the necessary information.

IV. DESIGN/EQUIPMENT PARAMETERS

1. **IN COMPLIANCE. Based on baghouse inspection records, VE readings, and stack test results, the baghouse appears to be maintained and operated properly.** The permittee shall not operate

EUMACHSCARF unless the baghouse is installed, maintained, and operated in a satisfactory manner.

2. **IN COMPLIANCE. Calibration records for the pressure drop monitors were provided and are attached. The normal pressure drop range is 2-10 in. H2O per module, and 7-17 in. H2O overall.** The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the baghouse and each baghouse compartment for EUMACHSCARF on a continuous basis. The appropriate pressure drop range will be specified in the MAP.

V. TESTING/SAMPLING

1. **IN COMPLIANCE. Permit was issued September 14, 2014, trial operation started May 2015, and stack test was October 27, 2015 which was within the 180 day window.** Within 180 days after commencement of trial operation, the permittee shall verify the visible emissions, PM, PM10, and PM2.5 emission rates from EUMACHSCARF baghouse stack by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 45 days following the last date of the test.

VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. Records were available.** The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

2. **IN COMPLIANCE. Pressure drop gauges for each compartment and across the baghouse are installed and operating properly as observed during the onsite inspection.** The permittee shall monitor the pressure drop on a continuous basis across the baghouse and for each compartment of EUMACHSCARF.

3. **IN COMPLIANCE. Records are maintained. Records for 2016 are attached.** The permittee shall record the pressure drop across the baghouse and for each compartment once per shift during scarfing operations for EUMACHSCARF.

4. **IN COMPLIANCE. Frequency of VE readings is being met as confirmed during the onsite inspection. No excess emissions requiring corrective action have been observed.** The permittee shall perform a Method 9 and Method 9A certified visible emission observation of EUMACHSCARF baghouse stack at least once every calendar week for a minimum of one hour during machine scarfing activities and shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUMACHSCARF. At a minimum, records shall include the date, time, name of observer/reader, presence of visible emissions, and corrective actions taken if necessary. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

5. **IN COMPLIANCE. See attached.** The permittee shall keep, in a satisfactory manner, a log of the hours of operation and number of tons scarfed per day. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

6. **IN COMPLIANCE. See attached. Monthly inspections are being performed.** The permittee shall perform monthly baghouse inspections to ensure optimal operation of the baghouse is maintained. The permittee shall keep records of the monthly baghouse inspections and maintenance activities the records shall be kept on file at the facility and make them available to the department upon request.

VII. REPORTING NA

VIII. STACK/VENT RESTRICTIONS

IN COMPLIANCE. Based on visual observation, stack appears to meet the requirements. The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted: SVSCARFBH – 72.1 inches maximum exhaust diameter, 160 feet minimum height above ground

IX. OTHER REQUIREMENTS NA

The following conditions apply to: FGSCARFBLDG

DESCRIPTION: Building fugitive emission sources from the operations in the scarfing building.

Emission Units: EUBLDGHEAT, EUMANUALSCARF, EUCUTSLICE
POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS
1. **IN COMPLIANCE. No excess visible emissions have been observed by the certified VE reader. I did not observe any visible emissions from the roof monitor while on site for the inspection.** Visible Emissions 20% opacity on a 6-minute average from FGSCARFBLDG Roof Monitor

II. MATERIAL LIMITS NA
III. PROCESS/OPERATIONAL RESTRICTIONS

1. **IN COMPLIANCE. Based on my observations during the inspection, these activities are performed inside.** The permittee shall perform the manual scarfing and cutting/slicing activities only inside the scarfing building.

IV. DESIGN/EQUIPMENT PARAMETERS NA
V. TESTING/SAMPLING NA
VI. MONITORING/RECORDKEEPING
1. **IN COMPLIANCE. Method 9 is performed on a weekly basis. No excess emissions have been observed. Attached is a sample of records.** The permittee shall perform a Method 9 certified visible emission observation of FGSCARFBLDG roof monitor at least once every calendar week for a minimum of one hour during scarfing and cutting/slicing activities and shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGSCARFBLDG. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, presence of visible emissions, and corrective actions taken if necessary. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

VII. REPORTING NA
VIII. STACK/VENT RESTRICTIONS NA
IX. OTHER REQUIREMENTS NA

From PTI 182-05C:
The following conditions apply to: FG-ENG2007>500
DESCRIPTION: Two SI engines at a major source greater than 500 horsepower.
Emission Units: EU-ENGCBFTC, EU-ENGCBFHS
POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS
1. **IN COMPLIANCE. In compliance based on manufacturer's certification. See attached.** NOx 3.04 pph EU-ENGCBFTC of FG-ENG2007>500
2. **IN COMPLIANCE. In compliance based on manufacturer's certification. See attached.** NO 4.58 pph EU-ENGCBFHS of FG-ENG2007>500

II. MATERIAL LIMITS
1. **IN COMPLIANCE. Generators use pipeline quality natural gas.** The permittee shall burn only pipeline quality natural gas, in FG-ENG2007>500.

III. PROCESS/OPERATIONAL RESTRICTIONS
1. **IN COMPLIANCE. See attached log.** The permittee shall not operate FG-ENG2007>500 for more than 500 hours per year per engine on a 12-month rolling time period basis as determined at the end of each calendar month.

2. **DID NOT EVALUATE. Did not obtain records to evaluate compliance at this time.** The permittee shall install, maintain, and operate each engine in FG-ENG2007>500 according to the manufacturer written instructions, or procedures developed by the owner/operator and approved by the engine manufacturer, over the entire life of the engine.

IV. DESIGN/EQUIPMENT PARAMETERS
1. **IN COMPLIANCE. The presence of an hours meter was verified during the onsite inspection.** The permittee shall equip and maintain each engine in FG-ENG2007>500 with non-resettable hours meters to

track the operating hours.

2. **IN COMPLIANCE. Based on information provided during the permitting process.** The nameplate capacity of each engine in FG-ENG2007>500 shall not exceed the following horsepower, as certified by the equipment manufacturer:
   a. EU-ENGCBFTC – 530 hp
   b. EU-ENGCBFHS – 800 hp

V. TESTING/SAMPLING NA

VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. Records were available.** The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.

2. **IN COMPLIANCE. See attached.** The permittee shall monitor and record, the hours of operation of each engine in FG-ENG2007>500, on a monthly and 12- month rolling time period basis, in a manner that is acceptable to the District Supervisor, Air Quality Division. The permittee shall keep all records on file and make them available to the Department upon request.

VII. REPORTING NA

VIII. STACK/VENT RESTRICTIONS

DID NOT EVALUATE. Did not evaluate stack height at this time. The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted: 1. SV-ENGCBFTC1 5.9 max exhaust diameter 35 min height above ground
2. SV-ENGCBFHS1 9.8 max exhaust diameter 40 min height above ground

IX. OTHER REQUIREMENTS

1. **IN COMPLIANCE. This is based solely on the conditions evaluated in this permit.** The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines, as they apply to FG-ENG2007>500.

The following conditions apply to: FG-ENG2007<500
DESCRIPTION: Four SI engines at a major source less than 500 horsepower and limited use.
Emission Units: EU-ENGCBFBS, EU-ENGWSAC, EU-ENGCBFDM, and EU-ENGCBFGS
POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

1. **IN COMPLIANCE. Based on engine spec sheet. See attached.** NOx 9.91 pph EU-ENGCBFBS of FG-ENG2007<500
2. **IN COMPLIANCE. Based on engine spec sheet. See attached.** NOx 9.91 pph EU-ENGWSAC of FG-ENG2007<500
3. **IN COMPLIANCE. Based on engine spec sheet. See attached.** NOx 7.70 pph EU-ENGCBFDM of FG-ENG2007<500
4. **UNABLE TO DETERMINE. At this time, there is no spec sheet for this engine although the pph limit was was derived during permitting and is based on engine size and AP-4 emission factors.** NOx 1.64 pph EU-ENGCBFGS of FG-ENG2007<500

II. MATERIAL LIMITS

1. **IN COMPLIANCE. Pipeline quality natural gas is in use.** The permittee shall burn only pipeline quality natural gas, in FG-ENG2007<500.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. **IN COMPLIANCE. See attached log.** The permittee shall not operate FG-ENG2007<500 for more than 500 hours per year per engine on a 12-month rolling time period basis as determined at the end of each calendar month.

2. **DID NOT EVALUATE. Did not obtain records to evaluate compliance at this time.** The permittee shall install, maintain, and operate each engine in FG-ENG2007<500 according to the manufacturer written instructions, or procedures developed by the owner/operator and approved by the engine manufacturer, over

the entire life of the engine.

IV. DESIGN/EQUIPMENT PARAMETERS

1. **IN COMPLIANCE. The presence of an hours meter was verified during the onsite inspection.** The permittee shall equip and maintain each engine in FG-ENG2007<500 with non-resettable hours meters to track the operating hours.

2. **IN COMPLIANCE. Based on information submitted in the permit application.** The nameplate capacity of each engine in FG-ENG2007<500 shall not exceed the following horsepower, as certified by the equipment manufacturer:
   a. EU-ENGCBFBS – 250 hp
   b. EU-ENGWSAC – 250 hp
   c. EU-ENGCBFDM – 145 hp
   d. EU-ENGCBFGS – 95 hp

V. TESTING/SAMPLING NA

VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. Records were available.** The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.
2. **IN COMPLIANCE. See attached log.** The permittee shall monitor and record, the hours of operation of each engine in FG-ENG2007<500, on a monthly and 12- month rolling time period basis, in a manner that is acceptable to the District Supervisor, Air Quality Division. The permittee shall keep all records on file and make them available to the Department upon request.

VII. REPORTING NA

VIII. STACK/VENT RESTRICTIONS

DID NOT EVALUATE. Did not evaluate stack height at this time. The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

1. SV-ENGCBFBS1	5.9	35
2. SV-ENGWSAC2	3.9	16
3. SV-ENGCBFDM1	16.1	20
4. SV-ENGCBFGS2	5.9	10

IX. OTHER REQUIREMENTS

1. **IN COMPLIANCE – Based on conditions evaluated in this permit**. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines, as they apply to FG-ENG2007<500.

2. **IN COMPLIANCE – Based on conditions evaluated in this permit** The permittee shall comply with all provisions of the New Source Performance Standards, as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, for Spark Ignition Stationary Reciprocating Internal Combustion Engines, as they apply to FG-ENG2007<500.

The following conditions apply to: EUCOALHANDLING

DESCRIPTION Pulverized coal silo

POLLUTION CONTROL EQUIPMENT Two bin vent filters

I. EMISSION LIMIT(S)

1. **IN COMPLIANCE. Based on routine VE observations by the certified VE reader, no excess emissions have been observed.** Visible Emissions 10% opacity on a 6-minute average from EUCOALHANDLING

2,3 and 4 DID NOT EVALUATE. Testing not required at this time. PM, PM10, PM2.5 - 0.005 gr/dscf.

IV. DESIGN/EQUIPMENT PARAMETERS

1. **IN COMPLIANCE. Based on VE readings with no excess visible emissions and inspection reports.** The permittee shall not operate EUCOALHANDLING unless both bin vent filters are installed, maintained, and operated in a satisfactory manner.

VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. Records were presented during the onsite inspection. No excess emissions have been observed by the certified VE reader.** The permittee shall perform a Method 9 certified visible emission observation of each bin vent filter at least once a month during processing activity. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written record of each required observation and corrective action taken.

2. **IN COMPLIANCE. Inspections are completed and records were presented to AQD. See attached record of two most recent inspections.** Permittee shall periodically inspect each bin vent filter to determine the operational and physical condition of each bin vent filter at least semiannually, and immediately after observing visible emissions in excess of the applicable limitation. Each bin vent filter shall be inspected as necessary immediately after a malfunction or failure of the bin vent filter or the process equipment to determine the reason for the malfunction or failure. Written records of each inspection and corrective action taken, if any, shall be maintained.

The following conditions apply to:EUCOKESCRNBLDGDD
DESCRIPTION Coke screening building DD
Flexible Group ID: NA
POLLUTION CONTROL EQUIPMENT Baghouse

I. EMISSION LIMIT(S)

1. **IN COMPLIANCE. Based on routine VE observations, no excess emissions have been observed.** Visible Emissions 5% on a 6-minute average from the baghouse.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. **IN COMPLIANCE. Compliance based on VE readings.** The permittee shall not operate the EUCOKESCRNBLDGDD unless the baghouse is installed, maintained, and operated in a satisfactory manner.

VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. Records were presented during the onsite inspection. No excess emissions have been observed by the certified VE reader.** The permittee shall conduct visible emission readings by a certified Method 9 observer of visible emissions from the coke screening building baghouse stack at least once a month during coke screening activities. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written record of each required observation and corrective action.

VIII. STACK/VENT RESTRICTION(S)

DID NOT EVALUATE. Did not evaluate stack height at this time.

IX. OTHER REQUIREMENT(S)

1. **IN COMPLIANCE. Building is evacuated through baghouse as viewed during the onsite inspection.** The Coke Screening Building DD shall be evacuated through a baghouse.
2. **IN COMPLIANCE. Conveyors are enclosed and/or covered as observed during the onsite inspection.** All coke handling conveyors shall be totally enclosed or covered with a 180 degree cover.

The following conditions apply to:EURAWMATHANDLING
DESCRIPTION Raw material handling system
POLLUTION CONTROL EQUIPMENT Baghouse

I. EMISSION LIMIT(S)

1. **UANBLE TO DETERMINE. Stack test is not required at this time.** PM 1.0 lb/hr from baghouse stack.
2. **IN COMPLIANCE. Based on 2015 MAERS report and 1 lb/hr and yearly hours of operation, emissions are 3.99 tons.** 4.39 tons per year.
3. **IN COMPLIANCE. Based on VE observation by the certified reader, no excess emissions have been observed.** - Visible Emissions 10%2 6-minute average from the baghouse stack
4. **IN COMPLIANCE - Based on VE observation by the certified reader, no excess emissions have been observed.** No visible emissions from conveyors, storage bins or raw material handling building

II. MATERIAL LIMIT(S) NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. **IN COMPLIANCE. Based on baghouse inspections and VE readings. See attached inspections.** The permittee shall not operate the stockhouse unless the baghouse is installed and operated properly.

2. **IN COMPLIANCE. Fugitive dust plan appears to be implemented based on records provided.** The permittee shall not operate the automated raw material handling system unless the fugitive dust control plan has been implemented and maintained.

IV. DESIGN/EQUIPMENT PARAMETER(S) NA
V. TESTING/SAMPLING NA
VI. MONITORING/RECORDKEEPING

1. **IN COMPLAINCE. See attached records.** The permittee shall monitor and record pressure drop across the baghouse weekly. A pressure drop of between 2 and 6 inches w.c. shall be considered normal and can be changed upon the request of the permittee, with the approval of the AQD District Supervisor. The permittee shall initiate appropriate maintenance activity on the baghouse if the pressure drop exceeds the normal range.

2. **IN COMPLIANCE. See attached summary record. Individual VE sheets are also maintained and were presented during the inspection.** The permittee shall perform a Method 9 certified visible emission observation of the raw material handling baghouse, conveyors, storage bins, and building at least once a month during processing activity. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written record of each required observation and corrective action taken.

3. **IN COMPLIANCE. See attached records.** The permittee shall periodically inspect the baghouse to determine the operational and physical condition of the baghouse at least once per month and immediately after observing visible emissions in excess of the applicable limitation. The baghouse will be inspected as necessary immediately after a malfunction or failure of the baghouse or the process equipment to determine the reason for the malfunction or failure. Written records of each inspection and corrective action taken, if any, shall be maintained.

VIII. STACK/VENT RESTRICTION(S)
DID NOT EVALUATE AT THIS TIME. Did not evaluate stack height at this time.

IX. OTHER REQUIREMENT(S) NA

The following conditions apply to: EUTREADWELLDRYOUT
Description: Treadwell car dry out operation
Flexible Group ID: NA
POLLUTION CONTROL EQUIPMENT NA

I. EMISSION LIMITS
IN COMPLIANCE. Based on VE readings, no excess emissions have been observed. Opacity limit of 20% 6-miute average from the Treadwell car dry out operation.

II. MATERIAL LIMIT(S) NA
III. PROCESS/OPERATIONAL RESTRICTION(S) NA
IV. DESIGN/EQUIPMENT PARAMETER(S) NA
V. TESTING/SAMPLING NA
VI. MONITORING/RECORDKEEPING

1. **IN COMPLIANCE. See attached records. No corrective actions needed.** The permittee shall conduct visible emissions readings by a Method 9 certified observer of visible emissions from the Treadwell car dry out operations at least once a month during Treadwell car dry out operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written record of each required observation and corrective action taken.

VIII. STACK/VENT RESTRICTION(S) NA
IX. OTHER REQUIREMENT(S) NA

COMPLIANCE DETERMINATION

At this time, the facility appears to be in compliance with the conditions evaluated in this report.

NAME Katie Kosk DATE 9/8/16 SUPERVISOR W.M.