DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility :	Gerdau MacSt	eel Monr	oe N	/lill			SRN:	B7061
Location :	3000 E FRON	STREE	Т				District :	Jackson
							County:	MONROE
City: M	ONROE	State:	MI	Zip Code :	48161	Comp		Compliance
Source Class	Source Class: MAJOR Staff: Mike Kovalchick					Kovalchick		
FCE Begin D	FCE Begin Date: 10/01/2020 FCE Completion 4/12/2022 Date:					4/12/2022		
Comments: Gerdau is in compliance although a few compliance concerns are outstanding. TMS International, located on Gerdau's property, also is in compliance.								

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
04/06/2022	MACT (Part 63)	Compliance	40 CFR 63 YYYYY semiannual Mercury Compliance report. No deviations.
04/05/2022	MAERS	Compliance	MAERS submittal.
04/05/2022	ROP Other	Compliance	Notification for completion of modifications under PTI 75-18 FG Meltshop IX.1. Report received by Mike via email on 9/28/21. Acceptable.
04/05/2022	ROP Other	Compliance	Notification for completion of modifications under PTI 75-18 (FG Meltshop IX.1). Acceptable.
04/05/2022	CEM RATA	Compliance	RATA testing test plan at Gerdau Monroe Mill. Acceptable.
04/05/2022	ROP Other	Compliance	Notification for completion of modifications under PTI 75-18 (FG Meltshop IX.1). Acceptable.
04/05/2022	Stack Test	Compliance	Test Plan Notification - Compliance Testing on Exhaust Stacks associated with electric Arc Furnace No. 1, EAF No. 2 and Ladle Metallurgy Furnace. Run times targeted for 8:00 a.m., each day.
04/05/2022	Stack Test	Compliance	Test Plan notification - Billet Reheat Furnace Stack Test Event. Start time targeted for 8:00 a.m.
04/05/2022	Malfunction Abatement Plan	Compliance	MAP revision under FGMELTSHOP III.3 requirements, PTI 75-18 completion. Revisions acceptable.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	Malfunction Abatement Plan	Compliance	Revision to MAP. Revisions acceptable.
04/05/2022	Malfunction Abatement Plan	Compliance	Revised plan to reflect the modifications that occurred as part of our melt shop CAPEX construction project outlined in PTI 75-18 and subsequent changes in melt shop operations. Deemed to be adequate.
04/05/2022	ROP Annual Cert	Compliance	2021 RATA Test Report. No deviations.
04/05/2022	ROP SEMI 2 CERT	Compliance	Semiannual Mercury Compliance report. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	CO EER Report. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	4th Qtr SO2 EER Report. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	4th Quarter QCGA. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	Quarter Opacity EER Report. Some minor opacity excursions just above 3% limit on EAF baghouse that were deemed to be insignificant.
04/05/2022	Stack Test	Compliance	Stack testing report under V.1, EU -BILLETRHEAT-WB. No deviations.
04/05/2022	ROP SEMI 2 CERT	Compliance	Semi annual - During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred except for a few small opacity excursions on the EAF baghouse that were just above the 3% limit which were deemed to be insignificant.
04/05/2022	ROP Annual Cert	Compliance	During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP.
04/05/2022	ROP Qrtly Cert	Compliance	4th Qtr CO EER Report, 4th qtr SO2 EER Report, 4th qtr QCGA report, 4th QTR Opacity EER Report. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	2nd QTR CO EER Report, 2nd QTR SO2 EER Report, 2nd QTR QCGA, 2nd QTR Opacity EER Report. No deviations.
04/05/2022	ROP Qrtly Cert	Compliance	1st qtr CO EER Report, 1st Qtr SO2 EER Report, 1st Qtr QCGA report, 1st QTR Opacity EER Report. No deviations.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2022	ROP Other	Compliance	Notification for completion of modifications under PTI 75-18 (FG Meltshop IX.1)
04/05/2022	MACT (Part 63)	Compliance	40 CFR 63 Semiannual Mercury Compliance Report. No deviations.
04/05/2022	MACT (Part 63)	Compliance	Semiannual Mercury Compliance Report. No deviations.
04/05/2022	ROP Semi 1 Cert	Compliance	During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met except deviations from these requirements or any other terms or conditions occurred. About 4 small opacity excursions occurred but the average was just above the 3% limit so deemed insignificant.
04/05/2022	Excess Emissions (CEM)	Compliance	1str and 2nd qtr 2021 Excess Emission Reports for CO, SO2 and Opacity. Semi-Annual Area Source Report
04/05/2022	MAERS	Compliance	MAERS report sent in paper form. This is for TMS International that operates a slag handling operation at Gerdau.
04/05/2022	ROP Qrtly Cert	Compliance	3rd quarter 2021 CEMS compliance report - 3rd qtr CO, SO2 and 3rd qtr CGA. No deviations.
04/05/2022	ROP Annual Cert	Compliance	During the entire reporting period this source was in compliance with all terms and conditions and contained in the ROP EXCEPT a few small opacity excursions that were just above the 3% limit which were deemed to be insignificant.
04/05/2022	ROP SEMI 2 CERT	Compliance	During the entire reporting period this source was in compliance with all terms and conditions and contained in the ROP EXCEPT several minor opacity exceedance for the EAF baghouse that were just above the 3% limit which were deemed to be insignificant.
04/05/2022	MAERS	Compliance	2021 MAERS Report and emissions forms via mail. This is for TMS International which operates a slag handling operation at Gerdau.

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04/05/2022	MAERS	Compliance	Received MAERS paperwork with original signature. EAF's emissions calculated from CEMS and the most recent stack test data available. (A new round of stacks tests were just conducted on EAF and LMF baghouses but that won't be available until next year's MAERS.) Shows compliance with applicable limits. Production has increased about 17% from previous year so emissions are higher. Increased production is partially related to completion of upgrades to Melt Shop and very good steel market conditions. Further increases in production/emissions are expected in 2022. Company changed around some of the emissions units which makes comparing emissions from previous year somewhat difficult. They split out emissions from EUMelt Shop to EU-EAF and a reporting group for LMF baghouse and other processes that also vent through that baghouse. Company also submitted paper copy of MAERS. Note that mercury threshold limit passed with 25 pounds of emissions from EAF. This is probably overstated as based on older stack test when mercury was more present in scrap from vehicles than it is now. No compliance concerns.
03/22/2022	On-site Inspection	Compliance	Compliance inspection/stack test observation.
09/22/2021	ROP Qrtly Cert	Compliance	4th Qtr CO EER Report Gerdau Monroe Mill experience zero incidents of CO emissions greater than 260 pounds per hour averaged over each month, 2.0 lbs/ton averaged over each month and 850 tons per year.
09/22/2021	ROP SEMI 2 CERT	Compliance	40 CFR 63 YYYYY Semiannual Mercury Compliance Report. Gerdau Monroe has not deviated from the requirements for the control of contaminants from scrap, as outlined in Section 63.10685(a)(1) and (a) (2)

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09/22/2021	Excess Emissions (CEM)	Compliance	4th Qtr CO, SO2, Opacity EER report and Cylinder Gas Audit Reports and Opacity Lens Filter Audit Reports. Gerdau Monroe Mill experienced zero incidents of SO2 emissions greater than 26 pound per hour limit and the 0.20 lb/ton limit. The Gerdau Monroe Mill experienced zero incidents of Opacity greater than three percent, averaged over a sixminute time period.
09/22/2021	MAERS	Compliance	MAERS Submission received electronically. Paper signature received 3/18/21
09/22/2021	ROP SEMI 2 CERT	Compliance	40 CFR 63 YYYYY Semiannual Mercury Compliance Report
09/22/2021	CEM RATA	Compliance	Electric Arc Furnace Baghouse Stack 1 and Stack 2. Passed
09/22/2021	ROP Qrtly Cert	Compliance	4th quarter CO, SO2, Opacity EER Report, 4th qtr cylinder gas audit reports and opacity lens filter audit reports.
09/22/2021	Excess Emissions (CEM)	Compliance	3rd Quarter , SO2 EER Report
09/22/2021	CEM RATA	Compliance	2020 CEM RATA. Passed.
09/22/2021	Excess Emissions (CEM)	Compliance	3rd qtr opacity EER Report.
09/22/2021	ROP Qrtly Cert	Compliance	1st qtr CO, SO2 EER Report
09/22/2021	ROP Qrtly Cert	Compliance	1st qtr QCGA report
09/22/2021	ROP Qrtly Cert	Compliance	1st qtr opacity EER Report
09/22/2021	ROP Qrtly Cert	Compliance	2nd qtr CO, SO2 EER Report, 2nd qtr QCGA report, 2nd QTR Opacity EER report
09/22/2021	ROP Semi 1 Cert	Compliance	Semi-annual During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference EXCEPT for the deviations identified on the enclosed deviation reports
09/22/2021	Excess Emissions (CEM)	Compliance	1st and second qtr EER for CO, SO2 and Opacity. Semi-annual Area Source Report
09/22/2021	ROP Annual Cert	Compliance	During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference.
09/22/2021	ROP SEMI 2 CERT	Compliance	Semi-annual - 07/01/20-12/31/20

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	ROP SEMI 2 CERT	Compliance	During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference EXCEPT for the deviations identified.
09/22/2021	ROP Annual Cert	Compliance	During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference EXCEPT for the deviations ideantified.
09/22/2021	MAERS	Compliance	2020 MAERS Supplemental control form submitted - only the Report certification -NOTE: no papers were with it (total of 1 page submitted) with original signature
09/22/2021	Excess Emissions (CEM)	Compliance	1st qtr CO EER, S02 EER, Opacity EER. and 1st qtr QCGA
09/22/2021	CEM RATA	Compliance	Revised submission of RATA report for Gerdau Monroe RY2020 per feedback from Regina Angellotti (EGLE - AQD/Detroit District Office)
09/22/2021	ROP Semi 1 Cert	Compliance	40 CFR 63 YYYYY Semiannual Mercury Compliance Report
09/22/2021	Excess Emissions (CEM)	Compliance	2nd Quarter CO EER Report
09/22/2021	ROP Qrtly Cert	Compliance	2nd Quarter QCGA
09/22/2021	Excess Emissions (CEM)	Compliance	2nd Quarter Opacity EER Report
09/22/2021	ROP Semi 1 Cert	Compliance	During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
09/22/2021	ROP Semi 1 Cert	Compliance	All monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
09/22/2021	Excess Emissions (CEM)	Compliance	2nd Quarter CO EER. No deviations.
09/22/2021	Excess Emissions (CEM)	Compliance	2nd Quarter SO2 EER Report. No excess emissions.
09/22/2021	ROP Qrtly Cert	Compliance	2nd Quarter QCGA.

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09/22/2021	Excess Emissions (CEM)	Compliance	2nd Quarter Opacity EER Report
09/22/2021	ROP Semi 1 Cert	Compliance	During the entire reporting period all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report
09/22/2021	ROP Semi 1 Cert	Compliance	1st and 2nd qtr 2021 Excess Emission Reports for CO, SO2 and Opacity. Semi-Annual Area Source Report. Some minor opacity excursions just above the 3% limit for opacity for the EAF baghouse that were deemed to be very insignificant.
09/22/2021	ROP Semi 1 Cert	Compliance	During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred EXCEPT for the deviations identified on the enclosed deviation report
09/22/2021	ROP Qrtly Cert	Compliance	1st Qtr CO, SO2, Opacity EER Reports and 1st Qtr QCGA
09/22/2021	ROP Qrtly Cert	Compliance	2nd Qtr. CO, SO2 and Opacity EER Reports. 2nnd Quarter QCGA
09/15/2021	Excess Emissions (CEM)	Compliance	2nd Quarter SO2 EER Report
02/03/2021	Excess Emissions (CEM)	Compliance	4th Qtr. CO EER Report, 4th Qtr SO2 report, 4th qtr Opacity EER Report, 40 CFR 63 YYYYY Semiannual Mercury Compliance Report. Gerdau Monroe has not deviated from the requirements for the control of contaminants from scrap, as outlined in Section 63.10685(a) and (a)2.
12/01/2020	ROP Semi 1 Cert	Non Compliance	South main fan amps were below the baseline. North main fan amps below baseline due damper positions closed to conserve during EAF start-up. VE readings missed. COVID related. Corrective actions reasonable.
12/01/2020	Excess Emissions (CEM)	Compliance	1st and 2nd quarter 2020 Excess Emission Reports for C, SO2 and Opacity. Semi-Annual Area Source Report

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12/01/2020	Excess Emissions (CEM)	Compliance	6/1/20 to 9/30/20, 3rd Quarter CO EER Report 3rd Quarter SO2, EER Report, 3rd Quarter Opacity EER Report. No excess emissions.
12/01/2020	CEM RATA	Compliance	2020 RATA report received

Name: Mike Kovaldrick Date: April 12,2022 Supervisor: