

# Prevention of Significant Air Quality Deterioration Review

## Final Determination

December 2010

Facility Name: Osceola Steel Company

City: Adel

County: Cook

AIRS Number: 04-13-075-0024

Application Number: 19537

Date Application Received: March 16, 2010



State of Georgia  
Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch

James A. Capp – Chief, Air Protection Branch

Stationary Source Permitting Program

Eric Cornwell  
Manny Patel  
Cynthia Dorrough

Planning & Support Program

James Boylan  
Rosendo Majano

## BACKGROUND

On March 16, 2010, Osceola Steel Company (hereafter Osceola Steel Company) submitted an application for an air quality permit to construct and operate a micro steel mill. The facility will be located at 475 Osceola Road in Adel, Cook County. The micro steel mill will be capable of producing 430,000 tons of scrap steel annually. The project will include one electric arc furnace, two horizontal ladle preheaters, one vertical ladle heating stack, two Tundish preheaters, one reheat furnace, two casting machine torches and three cooling towers. Natural gas will be fired in the electric arc furnace, the reheat furnace, both horizontal ladle and Tundish Preheaters, vertical ladle heating stack and the casting machine torches..

On November 16, 2010, the Division issued a Preliminary Determination stating that the modifications described in Application No. 19537 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that Osceola Steel Company place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in the *Adel News Tribune* (legal organ for Cook County) on November 17, 2010. The public comment period expired on December 17, 2010.

During the comment period, comments were received from the facility. There were comments received from the U.S. EPA Region IV and the general public.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

### U.S. EPA REGION 4 COMMENTS

Comments were received from Gregg Worley, Chief, Air Permits Section U.S. EPA Region 4, by email and letter on December 17, 2010. The comments are typed, verbatim, below and were the result of reviews by Sydnee Adams and Heather Abrams of U.S. EPA Region 4.

#### **Comment 1:**

On September 29, 2010 Significant Impacts Level for PM<sub>2.5</sub> was finalized. Region 4 calls this to the attention of EPD and request the state address this in the final determination.

#### **EPD Response to Comment 1:**

GAEPD modeled the facility assuming that PM<sub>2.5</sub> emissions are equal to those of PM<sub>10</sub>, hence the existing PM<sub>10</sub> significance modeling results can be used, ruling out this way the need to submit additional modeling.

To account for the contribution from the relevant nearby sources, background concentrations representative of the local conditions were added to the modeling results. Moreover, ambient concentrations of PM<sub>2.5</sub> are comprised of the contribution of the direct emissions from the stacks plus the secondary formation in the atmosphere due to the chemical reaction of other pollutants such as SO<sub>2</sub> and NO<sub>x</sub>. Therefore, background concentrations representative of the local conditions also account for secondary PM<sub>2.5</sub>.

The values used for background concentrations are 25 µg/m<sup>3</sup> for the 24-hour averaging period and 10.5 µg/m<sup>3</sup> for the annual period. They were extracted from the Valdosta, GA ambient monitoring station, located approximately 36 km SE from the project's site and operated by GA EPD. These values were calculated in the terms of the corresponding Standard.

Results show that all predicted concentrations of PM<sub>2.5</sub> plus the corresponding background are below the NAAQS. A summary of the maximum concentrations is shown in Table II.

**TABLE II. PM2.5 NAAQS ASSESSMENT.**

Pollutant	Averaging Period	Maximum Predicted Concentration* (µg/m <sup>3</sup> )	Background Concentration (µg/m <sup>3</sup> )	Total Impact** (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Receptor Location UTM Zone <u>16</u>		Model Met Data Period (yyymmddhh)
						X (m)	Y (m)	
PM2.5	Annual	0.35	10.5	10.85	15	269648.00	3442642.00	1988
	24 Hour	3.21	25.0	28.21	35	269549.00	3442651.00	88121924

The finalization of the Significant Impact Level for PM<sub>2.5</sub> on September 29, 2010 has no impact on the modeling since the facility has demonstrated compliance with the PM<sub>2.5</sub> NAAQS standard.

### **Osceola Steel Company Comments**

Comments were received on behalf of Osceola Steel Company from Ken Hiltgen, Project Manager/Principal at MACTEC Engineering and Consulting, Inc., via e-mail with a letter arriving under separate cover on December 7, 2010.

#### **Osceola Steel Company Comment 1**

**Emission Source Table and Condition 2.4** – Replace the name for source VLPH1 from “Vertical Ladle Heating Stack” to “Vertical Ladle Heater”. This operation vents inside the melt shop and will not therefore have a separate stack to the atmosphere.

#### **EPD Response to Comment 1.**

The Division agrees with Osceola Steel Company’s request to modify the name for source VLPH1 from “Vertical Ladle Heating Stack” to “Vertical Ladle Heater” in the Emission Source Table, Condition 2.4 and any other references to source VLPH1 throughout the permit.

<b>Emission Units</b>		<b>Air Pollution Control Devices</b>	
<b>ID No.</b>	<b>Description</b>	<b>ID No.</b>	<b>Description</b>
EAF	Electric Arc Furnace	BH1	Baghouse
VLPH1	<b>Vertical Ladle Heater</b>		
TPH1	Tundish Preheater 1		
TPH2	Tundish Preheater 2		
CMT1	Casting Machine Torch 1		
CMT2	Casting Machine Torch 2		
RHF	Reheat Furnace	N/A	N/A
HLPH1	Horizontal Ladle Preheat	N/A	N/A
HLPH2	Horizontal Ladle Preheat		
CT1	Cooling Tower No. 1	N/A	N/A
CT21	Cooling Tower No. 2 (1)	N/A	N/A
CT22	Cooling Tower No. 2 (2)	N/A	N/A
CT3	Cooling Tower 3	N/A	N/A
LS	Lime Silo	BH2	Baghouse
CS	Carbon Silo	BH3	Baghouse
CC1	Continuous Casting		
<b>Fugitive Emission Sources</b>			
SP	Slag Pile	N/A	N/A
SD, LD, SS, LS	Paved Roadways	N/A	N/A

- 2.4 For purposes of this Permit: Electric Arc Furnace (Source Code: EAF), **Vertical Ladle Heater**, (Source Code: VLPH), Horizontal Ladle Preheaters (Source Codes: HLP1 and HLP2), Tundish Preheaters (Source Codes: TPH1 and TPH2), and Casting Machine Torches (Source Codes: CMT1 and CMT2), Baghouse 1 (APCD Code: BH1) share a common stack, Stack No. BH1.  
[40 CFR 52.21(j)]

### **Osceola Steel Company Comment 2**

**Permit condition 2.4** - includes the two horizontal ladle pre-heaters (HLP1 and HLP2) as sources that vent out the main EAF baghouse. These sources however vent into a separate smaller room near the melt shop and will not therefore be collected by the EAF baghouse stack (BH1). They should be removed from this permit condition.

### **EPD Response to Comment 2**

The Division agrees with Osceola Steel Company's request to remove the reference to the horizontal ladle pre-heaters (HLP1 and HLP2) in Condition 2.4 as sources that vent out the main EAF baghouse.

- 2.4 For purposes of this Permit: Electric Arc Furnace (Source Code: EAF), Vertical Ladle Heater, (Source Code: VLPH1), ~~Horizontal Ladle Preheaters (Source Codes: HLP1 and HLP2)~~, Tundish Preheaters (Source Codes: TPH1 and TPH2), and Casting Machine Torches (Source Codes: CMT1 and CMT2), Baghouse 1 (APCD Code: BH1) share a common stack, Stack No. BH1.  
[40 CFR 52.21(j)]

### **Osceola Steel Company Comment 3**

**Permit condition 2.11** – remove the words “with Flue Gas Recirculation (FGR) Technology” from the condition. Flue Gas Recirculation (FGR) for this application is not feasible. The application provides details in the BACT section as to what controls are feasible. FGR is not. The exhaust gas from the EAF can not be recirculated to the burner. Low NOx oxy fuel burners will be used to control NOx formation.

### **EPD Response to Comment 3**

The Division agrees with Osceola Steel Company's request to remove the reference to “Flue Gas Recirculation (FGR) Technology” from the condition.

- 2.11 The Permittee shall install and operate, as BACT for NOx on Electric Arc Furnace (Source Code: EAF), Low NOx Burners ~~with Flue Gas Recirculation (FGR) Technology~~ and use Good Combustion and Operating Practices at all times the Electric Arc Furnace is in operation.  
[40 CFR 52.21(j)]

**Osceola Steel Company Comment 4**

**Permit Condition 2.12** – remove the term “high temperature” from the description of the baghouse. The type of bags for EAF are specifically designed for this type of application and there is no “high temperature” qualifier. Removing this term will avoid confusion regarding what type of control is necessary.

**EPD Response to Comment 4**

The Division agrees with Osceola Steel Company’s request to remove the “high temperature” qualifier from the description of the baghouse used to control particulate emissions from the Electric Arc Furnace (EAF) in Permit Condition 2.12.

- 2.12 The Permittee shall install and operate, as BACT for PM and PM<sub>10</sub> on Electric Arc Furnace (Source Code: EAF), a ~~high temperature~~ fabric filter (baghouse) to be in operation at all times the Electric Arc Furnace is in operation.  
[40 CFR 52.21(j)]

**Osceola Steel Company Comment 5**

**Permit Condition 2.13** [and corresponding change in **Condition 7.16 (b) iv**]- This permit condition limits the amount of sulfur in the combustible charge materials to 2.0% sulfur. Osceola requests this to be increased to 2.5% S. We have checked with suppliers of low sulfur coke, crushed coal and other carbon sources and a maximum of 2.5% S is a common specification for these materials. We do not know if these suppliers would be willing to supply the materials at the lower specification. Osceola is confident that it will be able to meet the emission level listed in condition 2.25(d) with its charge material specified at this maximum sulfur level.

**EPD Response to Comment 5**

The Division disagrees with a portion of Osceola Steel Company’s basis for requesting the sulfur content limit to be increased to 2.5% because it was not verified whether or not suppliers of low sulfur coke, crushed coal and other carbon sources would be unwilling to supply the materials at a lower sulfur content specification. In the preliminary determination, data was provided demonstrating sources of crushed coal were available with sulfur contents of less than 2.5% sulfur and these sources were readily available. However, Osceola has demonstrated with supporting calculations the use of carbon sources with a sulfur content of 2.5%, in conjunction with the use of the BACT limit of 0.18 lb/ton as proposed in Comment 8 would result in facility-wide emissions of less than the PSD significance level for SO<sub>2</sub> of 40 tons per year. Therefore, the Division agrees with changing the sulfur limit in Permit Condition 2.13 and corresponding Permit Condition 7.16(b)iv to the requested limit.

- 2.13 The Permittee shall install and operate, as BACT for SO<sub>2</sub> on Electric Arc Furnace (Source Code: EAF), the use of low-sulfur, carbon-based feed and charging materials containing less than ~~2.0~~ **2.5** percent sulfur by weight during all times the Electric Arc Furnace is in operation.  
[40 CFR 52.21(j)]
- 7.16 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition No. 7.17, the following excess emissions, exceedances, and excursions shall be reported:  
[40 CFR 52.21 and 391-3-1-.02(6)(b)1]
- b. Exceedances: (means for the purpose of this Condition and Condition No. 7.17, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)  
[40 CFR 52.21, 40 CFR 60.272a, and 391-3-1-.02(6)(b)1]
- vi. Anytime the sulfur content of the feed materials used to charge the Electric Arc Furnace (Source Code: EAF) exceeds ~~2.0~~ **2.5** percent sulfur by weight.

#### **Osceola Steel Company Comment 6**

**Permit condition 2.19** - remove the word “Ultra” from this condition. As indicated in the BACT analysis in the permit application, ultralow NO<sub>x</sub> burners are not a technology that could be used on these sources because of the nature of the operation requiring high temperatures at the point of use. The permit application outlines the various design and operational techniques that will be employed to meet BACT. Low NO<sub>x</sub> burners will be used.

#### **EPD Response to Comment 6**

The Division agrees with Osceola Steel Company’s request to remove the “Ultra” designation for the Low NO<sub>x</sub> burners that are required as BACT.

- 2.19 The Permittee shall install and operate, as BACT for NO<sub>x</sub> on all sources in the Small Combustion Sources Equipment Group (Source Codes: HLP1, HLP2, VLP1, TPH1, TPH2, CMT1 and CMT2), ~~Ultra~~ Low NO<sub>x</sub> Burners and use Good Combustion and Operating Practices as outlined in Condition 5.2 at all times the Small Combustion Sources are in operation.  
[40 CFR 52.21(j)]

**Osceola Steel Company Comment 7**

**Permit Conditions 2.20 & 2.21** – Both of these conditions reference condition 5.2 as an operating practice however the operating practice is good combustion which is discussed in condition 5.8. Please make that reference change in both permit conditions.

**EPD Response to Comment 7**

The Division agrees with Osceola Steel Company's request

2.20 The Permittee shall install and operate, as BACT for PM, PM<sub>10</sub> and PM<sub>2.5</sub> on all sources in the Small Combustion Sources Equipment Group (Source Codes: HLPH1, HLPH2, VLPH, TPH1, TPH2, CMT1 and CMT2), the use of Good Combustion and Operating Practices as outlined in Condition ~~5.2~~ **5.8**.

[40 CFR 52.21(j)]

2.21 The Permittee shall install and operate, as BACT for SO<sub>2</sub> on all sources in the Small Combustion Sources Equipment Group (Source Codes: HLPH1, HLPH2, VLPH, TPH1, TPH2, CMT1 and CMT2), the use of Good Combustion and Operating Practices as outlined in Condition ~~5.2~~ **5.8**.

[40 CFR 52.21(j)]

**Osceola Steel Company Comment 8**

**Permit Condition 2.25(d)** - This is the permit condition for SO<sub>2</sub> emissions from the EAF. EPD did not accept our proposed BACT level of 0.20 lb/ton and instead believes BACT to be 0.15 lb/ton. However, when that BACT emission level is used in the calculations the total SO<sub>2</sub> emissions from the facility totals 32.6 tons per year which is less than the PSD trigger level. We request a PSD avoidance emission level of 0.18 lb/ton which then results in a total allowable emissions from the facility to be 39 TPY. To summarize we request an emission level change in this condition to 0.18 lb/ton the reference regulation to change from "40CFR 52.21 (j)" to "40CFR 52.21 avoidance". The total SO<sub>2</sub> emissions listed in on Page 1 of the Preliminary Determination would then change from "43.3" TPY to "39" TPY.



**EPD Response to Comment 8**

Based on supporting calculations provided by Osceola Steel Company demonstrating the use of the proposed emission limit of 0.18 lb/ton, the facility was able to demonstrate that facility-wide emissions for SO<sub>2</sub> would be under the significance level of 40 tpy. Because the facility wide limit with the use of the proposed emission limit will be under the significance level, the limit is now a PSD Avoidance limit rather than a BACT limit, therefore, the Division agrees with Osceola Steel Company's request.

2.25 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from Electric Arc Furnace (Source Code: EAF), any gases which:

- d. Contain Sulfur Dioxide (SO<sub>2</sub>) in excess of ~~0.15~~ **0.18** lb/ton on a 3-hour basis.  
[Avoidance of 40 CFR 52.21(j)]

**Osceola Steel Company Comment 9**

**Permit Condition 2.26** – In condition 2.26(a) change 8 hour average basis to 3 hour average basis to match the reference method for testing.

In condition 2.26(b) replace “lb/ton” with “lb/mmBTU”. This is a condition regarding NO<sub>x</sub> emissions from the reheat furnace. All the BACT determinations on the reheat furnace are on a lb/mmBTU basis. We believe this is a simple typographical error. The same error occurs in the Preliminary Determination on pages 63 and 77. Pages 59 and 60 of the PD lists the units correctly.

**EPD Response to Comment 9**

The Division agrees with Osceola Steel Company's request to modify Permit Condition 2.26(b), however modifications are not made to the preliminary determination upon its issuance, therefore no changes will be made to the preliminary determination.

2.26 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from Reheat Furnace (Source Code: RHF), any gases which

- b. Contain Nitrogen Oxides (NO<sub>x</sub>) in excess of 0.075 lb/~~ton of steel processed~~ **MMBtu** on a 3-hour average basis.  
[40 CFR 52.21(j)]

**Osceola Steel Company Comment 10**

**Permit Condition 2.27** – Osceola accepts the specified drift level of 0.0005% as a permit condition. However, we request that the word “guaranteed” be eliminated as part of this condition. That term has special meaning in contractual language in purchase agreements with vendors.

**EPD Response to Comment 10**

The Division agrees with Osceola Steel Company’s request to modify Permit Condition 2.27, to remove the word “guaranteed” from the permit condition.

2.27 The Permittee shall not cause, let, suffer, permit or allow a mass flow rate on the cooling towers (Source ID No. CT1, CT21, CT22 and CT23) equal to or greater than as determined to allow drift eliminator effectiveness of 0.0005% ~~guaranteed~~.

The limit of this permit condition apply during all times of operation, including startup, shutdown, and malfunction.

[40 CFR 52.21(j)]

**Osceola Steel Company Comment 11**

**Permit Condition 3.4** - This permit condition is describing the unprocessed slag pile. For clarification please insert “unprocessed” in front of the word slag at both places that slag is mentioned.

**EPD Response to Comment 11**

The Division agrees with Osceola Steel Company’s request to modify Permit Condition 3.4, to add the word “unprocessed” to the permit condition.

3.4 The Permittee shall not cause, let, suffer, permit or allow the drop height of the **unprocessed** slag piles (Source Code: SP) to be equal to or exceed 25 feet while equipment is stationary and 5 feet while equipment is mobile. The area of the **unprocessed** slag pile shall not exceed an area of 75 ft. x 75 ft.

The limit of this permit condition apply during all times of operation, including startup, shutdown, and malfunction.

[40 CFR 52.21(j) and 391-3-1-.02(2)(n) (subsumed)]

**Osceola Steel Company Comment 12**

**Permit Condition 5.2** - The condition requires bag leak detection systems not only on the EAF but on the lime and carbon silos as well. The bag leak detection system on the EAF is a requirement of NSPS Subpart AAa for EAF operations. The carbon and lime silos are not regulated under this rule. The potential emissions from these two silos are small and the controlled emissions from these two units are three orders of magnitude less than the EAF. We request that the condition reading “system on all baghouses (Source codes: BH1, BH2 and BH3)” be changed to “system on the EAF baghouse (Source Code BH1” . Osceola will still make daily visible checks of baghouses BH2 and BH3 as required by condition 5.5.

**EPD Response to Comment 12**

The Division agrees with Osceola Steel Company’s request to modify Permit Condition 5.2, to remove reference to Baghouses BH2 and BH3

5.2 The Permittee shall, install, calibrate, maintain and operate a bag leak detection system on ~~all the EAF baghouse~~ (Source Codes: BH1, ~~BH2 and BH3~~). The bag leak detection system must be installed and continuously operated. The bag leak detection system must meet the following specifications:

[40 CFR 52.21, 40 CFR 60.273a(c) and 391-3-1-.02(6)(b)]

- a. The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.
- b. The bag leak detection system sensor must provide output of relative particulate matter loadings and the Permittee shall continuously record the output from the bag leak detection system using electronic means.
- c. The bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate loading is detected over the alarm set point established according to paragraph (e)(4) of 40 CFR 60.273a, and the alarm must be located such that it can be heard by the appropriate plant personnel.
- d. For each bag leak detection system required by paragraph (e) of 40 CFR 60.273a, the Permittee shall develop and submit, for approval by the Division, a site-specific monitoring plan that addresses the items identified in paragraphs (i) through (v) of 40 CFR 60.273a (e)(4).

**Osceola Steel Company Comment 13**

**Permit Conditions 5.3, 5.9 & 5.11** – Incorrect regulatory citations are present in these conditions due to typographical errors. Condition 5.3 should list 40 CFR 60.273a(c). Condition 5.9 should list 40 CFR 60.274a(f). Condition 5.11 should list 40 CFR 60.274a(h).

**EPD Response to Comment 13**

The Division agrees with Osceola Steel Company's request, and the aforementioned changes will be made.

- 5.3 The Permittee shall perform melt shop opacity observations at a minimum of once per day during a meltdown and refining period and retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The observations shall be performed by a certified visible emissions observer, taken in accordance with Method 9, and, shall be for at least three six-minute periods when the furnace is operating in the melting and refining period.  
[40 CFR **60.273a**(c), 40 CFR 60.274a(f), 391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- 5.9 The Permittee shall install, calibrate, and maintain a monitoring device that allows the pressure in the free space inside the EAF to be monitored. The pressure shall be recorded as 15-minute integrated averages. The monitoring device may be installed in any appropriate location in the EAF or DEC duct prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring device shall have an accuracy of  $\pm 5$  mm of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.  
[40 CFR 52.21(j) and 40 CFR **60.274a**(f)]
- 5.11 During any performance test required under §60.8, and for any report thereof required by 40 CFR 60.276a(f) or to determine compliance with 40 CFR 60.272a(a)(3), the Permittee shall monitor the following information for all heats covered by the test:  
[40 CFR 52.21(j) and 40 CFR **60.274a**(h)]

**Osceola Steel Company Comment 14**

**Permit condition 5.14a** - be revised to eliminate monitoring steel production at the reheat furnace and specify the location of steel production for the EAF as follows.

*5.14 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.*

*a. The quantity of steel produced in tons per hour from the Electric Arc Furnace ~~and the Reheat Furnace~~. Data shall be measured at the caster and recorded hourly.  
[391-3-1-.02(6)(b)1 and 40 CFR 52.21]*

Emissions from the reheat furnace result from the combustion of natural gas in the furnace burners and are not related or impacted directly by the amount of steel going through the unit. Emissions are calculated on a lb/MMBtu basis. For this reason, the amount of steel going through the furnace is immaterial and does not need to be monitored.

The caster is the only place where the weight of the steel produced can be reliably measured on a continuous basis and quantified. The EAF is a batch operation and therefore Osceola would request this clarification be added to the permit condition to avoid confusion as to where the rates will be measured.

**EPD Response to Comment 14**

The Division agrees with Osceola Steel Company's request, and the aforementioned changes will be made.

**Osceola Steel Company Comment 15**

**Permit condition 7.19** appears to have 2 small reference errors. We would request the following change in this condition.

*7.19 The Permittee shall use the monthly fuel consumption required by Condition ~~7.17~~ 7.18 and monthly charge material addition records required by Condition ~~7.11~~ 5.11, to calculate GHG emissions in tons GHG, on a CO<sub>2</sub>e basis to demonstrate compliance with Condition 2.33. This information shall be recorded in a permanent form suitable and available for inspection.  
[Avoidance of 40 CFR 52.21]*

**EPD Response to Comment 15**

The Division agrees with Osceola Steel Company's request, and the aforementioned changes will be made.

**Osceola Steel Company Comment 16**

In reviewing the draft permit we found several other incorrect references that need to be cleaned up which you may have already caught. Conditions 2.14, 2.15, 2.16, 2.17, 2.18, 2.19, 2.20 & 2.21 all refer to condition 5.2 when referencing "good combustion practices". The correct reference in the permit is condition 5.8. Please change 5.2 to 5.8 in these conditions for the final permit.

**EPD Response to Comment 16**

The Division agrees with Osceola Steel Company's request, and the aforementioned changes will be made.

**General Public Comments**

Verbal Comments were received from Mr. Roland Tiveron, Resident of Adel, Georgia, on December 16, 2010.

**Comment 1:**

“Will EPD will have monitoring in place to assure that the fabric filter is doing its Job? Will EPD be notified if there is a malfunction and can public get a copy of the notification?”

**EPD Response to Comment 1:**

Draft Permit Condition 5.2 requires Osceola Steel Company to install baghouse leak detectors on all the process baghouses. The baghouse leak detection system is required to be operated continuously and is required to have audible alarm in case of increase outlet loading from the baghouse. Draft Permit Condition 7.5 also requires the facility to submit a site-specific monitoring plan involving the baghouse leak detection. In addition to the baghouse leak detectors, Draft Permit Condition 5.5 requires Osceola Steel Company to make visible emission observations of each baghouse (APCD ID Nos. BH1, BH2 and BH3) at least once per day of operation of the furnace. GAEPD believes that it has adequate monitoring provisions in the draft permit which will provide assurance of the proper operation of the baghouse.

Draft Permit Condition 6.3 requires Osceola Steel Company to perform test on the process baghouse within 180 days of achieving maximum production rate. Draft Condition 7.15 requires the facility to submit a excess emission report on a Quarterly basis. Both the test reports and quarterly report are public documents and are available to public at any time.

**EPD CHANGES**

Currently, CO<sub>2e</sub> emissions from the Osceola Steel Company PSD project have the potential to exceed the 75,000 tpy CO<sub>2e</sub> threshold outlined in Step 1 of the GHG Emissions Tailoring Rule, however the likelihood of the facility exceeding the 75,000 tpy CO<sub>2e</sub> threshold is minimal. EPD proposed a GHG limit of 74,900 tpy of CO<sub>2e</sub>. Step 1 of this final rule will take effect on January 2, 2011. It is proposed the final permit for Osceola Steel Company will be issued prior to January 2, 2011, therefore all references to the GHG limit of 74, 900 tpy of CO<sub>2e</sub> and any associated monitoring and recordkeeping requirements will be removed from the final permit.

Permit Condition 2.36, Permit Condition 7.16(b)vii and Permit Condition 7.19 have been removed from the permit as a result of the permit issuance prior to January 2, 2011.



# **APPENDIX A**

## **AIR QUALITY PERMIT**

## **APPENDIX B**

### **WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD**