SOURCE TEST REPORT COMPLIANCE TESTING C-BLAST FURNACE BAGHOUSE AK STEEL DEARBORN WORKS DEARBORN, MICHIGAN

Prepared for:



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AIR QUALITY DIV.

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May 2017



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

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RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name AK Steel Dearborn Works	County Wayne
Source Address 4001 Miller Road	City Dearborn
AQD Source ID (SRN) A8640 ROP No. MI-ROP-A8640 2016a	ROP Section No. 1
Please check the appropriate box(es):	
Annual Compliance Certification (Pursuant to Rule 213(4)(c))	
Reporting period (provide inclusive dates): From To 1. During the entire reporting period, this source was in compliance with ALL term and condition of which is identified and included by this reference. The m method(s) specified in the ROP.	terms and conditions contained in the ROP, each
2. During the entire reporting period this source was in compliance with all term and condition of which is identified and included by this reference, EXC deviation report(s). The method used to determine compliance for each term unless otherwise indicated and described on the enclosed deviation report(s).	EPT for the deviations identified on the enclosed
	2/2/(-))
Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 21	3(3)(C))
Reporting period (provide inclusive dates): From To 1. During the entire reporting period, ALL monitoring and associated recordke deviations from these requirements or any other terms or conditions occurred.	· · · · · · · · · · · · · · · · · · ·
2. During the entire reporting period, all monitoring and associated recordkeep deviations from these requirements or any other terms or conditions occurred, enclosed deviation report(s).	bing requirements in the ROP were met and no EXCEPT for the deviations identified on the
Other Report Certification	
Reporting period (provide inclusive dates): From <u>3/28/2017</u> To	
Additional monitoring reports or other applicable documents required by the ROP C-Blast Furnace Baghouse Emissions Testing Report	are attached as described.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Nicholas Kohlhas

Name of Responsible Official (print or type)

Kohlher

Signature of Responsible Official

* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

Title

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5/23

General Manager

MAY 3 0 2017

AIR QUALITY DIV.

1. INTRODUCTION

Environmental Quality Management, Inc. (EQM) was retained by AK Steel Dearborn Works to plan and conduct a compliance air sampling program at the C-Blast Furnace Baghouse exhaust. The compliance program was conducted to evaluate emissions of filterable and condensable particulate (PM, PM₁₀, and PM_{2.5}); metals [lead (Pb) and manganese (Mn)]; carbon monoxide (CO); nitrogen oxide (NOx); volatile organic compounds (VOC); and visible emissions (VEs). Three sampling runs (each run at least 1 cast in duration) were conducted for each method except for visible emissions. One 1-hour run was conducted for visible emissions concurrently with each PM/CPM sampling run. EPA-approved sampling methods and laboratory analysis procedures were used to meet the objectives of the sampling program.

An outline of the test program is presented in Table 1-1. Project participants and responsibilities are presented in Table 1-2.

Test Point No.	Test Point Name	Parameter Tested	Test Method
1	C-Blast Furnace Baghouse	Flow	EPA Method 2
		Moisture	EPA Method 4
		PM/Condensables	EPA Method 5/202
		O2, CO2, CO, NOx	EPA Method 3A, 7E & 10
		Metals: Pb and Mn	EPA Method 5/29
		VOC	EPA Method 25A
		Opacity	EPA Method 9

Table 1-1.Sampling Requirements for AK Steel
Dearborn, Michigan

Table 1-2. Project Participants				
Name/Company	Responsibility			
David Pate/AK Steel	Coordinate process operation and sampling activities			
	Site/Process preparation			
	Process information			
David Patterson/DEQ	Agency Review of Process and Sampling Procedures			
Katherine Koster/DEQ				
Dan Scheffel/EQM	Project Manager			
Chris Janzen/EQM	Field sampling crew			
Ben Fern/EQM	Field sampling crew			
Gary Drexler/EQM	Field sampling crew			
Nick Pharo/EQM	Field sampling crew			
Eric Zang/EQM	Field sampling crew			
Robert Bingham/Smoke Reader LLC	VE observations			

Table 1-2.Project Participants

2. SUMMARY OF TEST RESULTS

The emission measurement program was performed on March 28 and 29, 2017. Table 2-1 presents the average results and limit comparison. Table 2-2 presents a summary of stack gas conditions. Table 2-3 presents total particulate concentrations and mass emission rates. Table 2-4 presents manganese concentrations and mass emission rates. Table 2-5 presents lead concentrations and mass emission rates. Table 2-6 presents nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compound (VOC) concentrations and mass emission rates.

Appendix A summarizes emission and example calculations, Appendix B presents field data, Appendix C presents laboratory results, Appendix D presents calibration data, Appendix E presents process data, Appendix F presents visible emissions data, and Appendix G presents the test protocol and regulatory letter regarding the test effort.

14010 2-1.	Average Results and Lindit Comparison					
Pollutant	C-Blast Furnace Baghouse	Limits ^a				
PM (lb/hr)	0.74	13.87				
PM10 (lb/hr)	1.26	18.24				
PM _{2.5} (lb/hr)	1.26	18.24				
Mn (lb/hr)	0.010	0.042				
Lead (lb/hr)	0.0003	0.0077				
VOC (lb/hr)	1.14	9.92				
NO _x (lb/hr)	2.13	5.46				
CO (lb/hr)	34.56	56.25				
VE	0% ^b	10%°				

 Table 2-1.
 Average Results and Limit Comparison

*Limits as provided in Permit MI-ROP-A8640-2016a.

^b Calculated as highest observed 6-minute average.

^c 6-minute average.

Table 2-2. **Stack Gas Conditions C-Blast Furnace Baghouse**

Stack Gas Volumetric Flow Rate Stack Moisture Velocity, Temperature, Content, CO₂, **O**₂, fps^a acfm^b ٩F % % Run No. **Date/Time** dscfm^c % H₂O Method 5/202 Test Runs (Total Particulate) 0.7 0.2 21.1 3/28/2017 1140-1649 62.9 475,889 442,531 103 1 0.1 2 3/29/2017 0801-1044 60.3 455,986 426,859 106 0.6 20.7 411,550 116 0.8 0.1 20.6 3/29/2017 1313-1718 59.2 447,926 3 60.8 459,933 426,980 108 0.7 0.1 20.8 Average Method 5/29 Test Runs (Metals) 3/28/2017 1140-1648 60.6 457,910 423,766 105 0.8 0.2 21.11 0801-1044 3/29/2017 413,100 107 0.7 0.1 20.7 2 58.6 442,823 0.1 3/29/2017 1313-1716 59.2 447,898 411,078 117 0.6 20.6 3 449,544 415,981 110 0.7 0.1 20.8 59.5 Average

March 28-29, 2017

AK Steel, Dearborn Works

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^aFeet per second.

^bActual cubic feet per minute.

°Dry standard cubic feet per minute.

Table 2-3.Total Particulate EmissionsC-Blast Furnace Baghouse

		Total Particulate Matter		Filterable Particu	late Matter	Condensable Particulate Matter	
Run No.	Date/Time	Concentration, gr/dscf ^a	Mass Rate, lb/hr ^b	Concentration, gr/dscf ^a	Mass Rate, Ib/hr ^b	Concentration, gr/dscf ^a	Mass Rate, lb/hr ^b
1	3/28/2017 1140-1649	3.59E-04	1.36	2.00E-04	0.76	1.59E-04	0.60
2	3/29/2017 0801-1044	3.48E-04	1.27	1.99E-04	0.73	1.49E-04	0.55
3	3/29/2017 1313-1718	3.27E-04	1.15	1.63E-04	0.74	1.18E-04	0.42
	Average	3.45E-04	1.26	1.87E-04	0.74	1.42E-04	0.52

^aGrains per dry standard cubic foot.

^bPounds per hour.

March 28-29 2017

Note - Condensable particulate results are corrected with Field Blank results.

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Table 2-4.Front-Half and Back-Half Manganese and Total Manganese Emissions
C-Blast Furnace Baghouse

March 28-29, 2017

AK Steel, Dearborn Works

AK Steel Dearborn Works

		Front Half Manganese		Back Half M	langanese	Total Manganese	
Run No.	Date/Time	Concentration, µg/dscm ^a	Mass Rate, lb/hr ^b	Concentration, µg/dscm ^a	Mass Rate, Ib/hr ^b	Concentration, µg/dscm ^a	Mass Rate, lb/hr ^b
1	3/28/2017 1140-1648	6.8	1.07E-02	1.7	2.76E-03	8.5	1.35E-02
2	3/29/2017 0801-1044	2.2	3.35E-03	3.3	5.06E-03	5.4	8.40E-03
3	3/29/2017 1313-1716	2.8	4.29E-03	2.6	3.97E-03	5.4	8.26E-03
	Average	3.9	6.12E-03	2.5	3.93E-03	6.4	1.01E-02

^aMicrograms per dry standard cubic meter.

^bPounds per hour.

Note: Metals data was blank corrected.

Front-Half and Back Half-Lead and Total Lead Emissions Table 2-5. **C-Blast Furnace Baghouse**

		Front-Hal	f Lead	Back-Hal	f Lead	Total Lo	ead
Run No.	Date/Time	Concentration, µg/dscmª	Mass Rate, lb/hr ^b	Concentration, µg/dscmª	Mass Rate, lb/hr ^b	Concentration, µg/dscm ^a	Mass Rate, lb/hr ^b
1	3/28/2017 1140-1648	0.1	2.18E-04	0.1	9.54E-05	0.2	3.13E-04
2	3/29/2017 0801-1044	0.1	2.28E-04	0.1	1.41E-04	0.2	3.69E-04
3	3/29/2017 1313-1716	0.1	1.78E-04	0.1	1.22E-04	0.2	3.00E-04
	Average	0.1	2.08E-04	0.1	1.19E-04	0.2	3.27E-04

^aMicrograms per dry standard cubic meter.

^bPounds per hour.

Note: Metals data was blank corrected.

2-4

NOx, CO, and VOC Emissions Table 2-6. **C-Blast Furnace Baghouse**

March 28-29, 2017 AK Steel, Dearborn Works								orn Works	
	Nitrogen Oxides			Carbon Monoxide			Volatile Organic Compounds		
	Concentration,	Mas	s Rate	Concentration,	Mass	Rate	Concentration,	Mas	s Rate
Run Date/Time	ppm ^a	lb/hr ^b	lb/ton ^c	ppm ^a	lb/hr ^b	lb/ton ^c	ppm ^a	lb/hr ^b	lb/ton ^c
3/28/2017 1140-1648	0.5	1.62	5.83E-03	23.7	45.79	0.17	1.3	1.47	5.28E-03
3/29/2017 0801-1044	0.8	2.36	8.81E-03	7.9	14.79	0.06	0.6	0.66	2.48E-03
3/29/2017 1313-1716	0.8	2.40	6.63E-03	24.0	43.08	0.12	1.3	1.30	3.59E-03
Average	0.7	2.13	7.09E-03	18.6	34.56	0.11	1.1	1.14	3.78E-03

^aParts per million, dry basis. VOC ppm is methane corrected, wet basis.

^bPounds per hour.

Pounds per ton.

3. SAMPLING AND ANALYTICAL PROCEDURES

The sampling and analytical procedures used in this test program conform to EPA Reference Methods 1 through 4, 5, 7E, 9, 10, 25A, 29, and 202, as published in the Federal Register.

3.1 Location of Measurement Sites

EPA Method 1, "Sample Velocity Traverses for Stationary Sources," was used to select representative measurement sites. The sampling location was at the exhaust of the C-Blast Furnace baghouse. A schematic of the test location is shown in Figure 4-1 in Section 4.

3.2 Stack Gas Volumetric Flow Rate

EPA Method 2, "Determination of Stack Gas Velocity and Volumetric Flow Rates," was used to determine stack gas volumetric flow rates. Type "S" pitot tubes meeting EPA specifications and an inclined manometer were used to measure velocity pressures. A calibrated Type "K" thermocouple attached directly to the pitot tube was used to measure stack gas temperature. The stack gas velocity was calculated from the average square root of the stack gas velocity pressure, average stack gas temperature, stack gas molecular weight, and absolute static pressure. The volumetric flow rate is the product of velocity and stack cross-sectional area.

3.3 Stack Gas Dry Molecular Weight

The baghouse sampling location was sampled continuously for CO₂ and O₂ by using nondispersive infrared analyzers (CO₂) or paramagnetic analyzers (O₂); gaseous pollutants were measured according to EPA Reference Method 3A, "Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)." Figure 3-1 is a schematic of the sampling system.

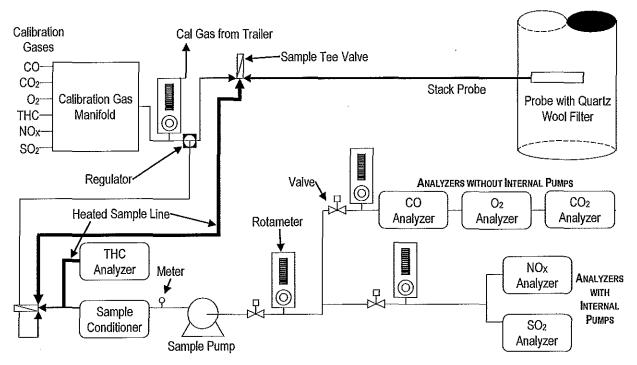


Figure 3-1. CEM Sample Flow and Calibration System Note: This study used the CO, NO_X, THC, CO₂, and O₂ analyzers.

3.4 Stack Gas Moisture Content

EPA Reference Method 4, "Determination of Moisture Content in Stack Gases," was used to determine stack gas moisture content. This method was conducted as part of each particulate and metals measurement run. The initial and final contents of all impingers were determined gravimetrically.

3.5 Filterable Particulate and Condensable

EPA Methods 5/202 were used to measure the concentration and mass emission rate of total filterable particulate matter. Particulate matter of less than 10 microns (PM₁₀) and particulate matter of less than 2.5 microns (PM_{2.5}) were determined as the sum of the filterable and condensable fractions. Three sampling runs and a blank were collected at the baghouse stack outlet location. Figures 3-2 and 3-3 present schematics of the sampling trains for Method 5 and Method 202, respectively.

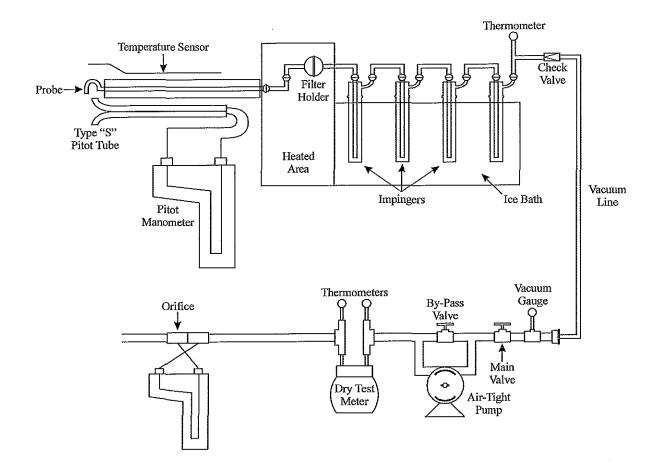


Figure 3-2. Method 5 Front-half of Sampling Train

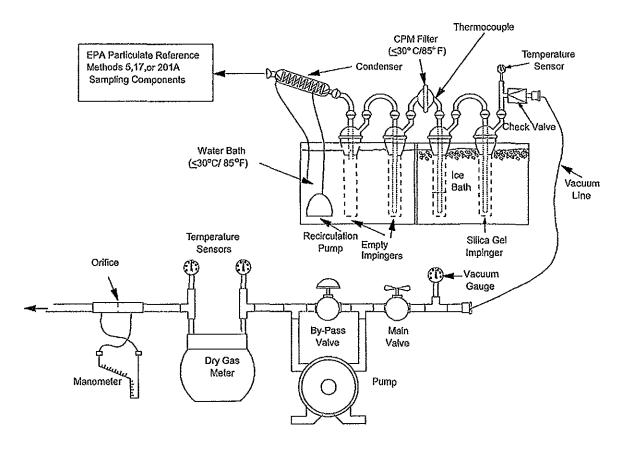


Figure 3-3. Method 202 Sampling Train

3.6 Nitrogen Oxides (NO_x)

Nitrogen oxide concentrations were analyzed following the procedures of EPA Reference Method 7E, "Determination of Nitrogen Oxide Emissions from Stationary Sources by Instrumental Analyzer Technique." The sampling system consists of a stainless steel probe, a glass fiber filter for particulate matter removal, a heated Teflon sampling line, and a sample gas conditioner to remove moisture prior to the gas entering the chemiluminescent analyzer. A zero gas and two Protocol One calibration gases were used to calibrate the instrument. Data was recorded on a data-logging system recording 1-minute averages of pollutant data. Figure 3-1 is a schematic of the continuous emission analyzer system. An NO₂-NO_x converter efficiency test was conducted according to EPA Method 7E. An NO₂ calibration gas with a value of 52.2 ppm was introduced to the analyzer. The lowest response observed was 49.06 ppm, which is an efficiency of 94.0%. This result is above the 90% converter efficiency that is required. Results are provided in Appendix B.

3.7 Carbon Monoxide (CO)

Carbon monoxide concentrations were sampled and analyzed continuously following the procedures of EPA Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources by Instrumental Analyzer Technique." The same sampling system that was used for the other continuous analyzers was used for the CO analyzer. The instrument used is a non-dispersive infrared analyzer manufactured by Thermo Environmental.

A zero gas and two calibration gases were used to calibrate the instrument. Figure 3-1 is a schematic of the sampling system.

3.8 Volatile Organic Compounds (VOC)

EPA Reference Method 25A, "Determination of Total Gaseous Organic Concentration," was used. The sampling system consisted of an Inconel stainless steel probe, a heated Teflon® line, and a heated flame ionization analyzer (FIA). The FIA was calibrated with three Protocol One methane standards in air and a zero gas. Calibrations and drift checks were conducted after each sampling run. Data was reduced on a dry basis using moisture values from the EPA Reference Method 5 sampling system. A schematic of the sampling system is shown in Figure 3-1. The instrument used was a J.U.M. Model 109A analyzer, which contains two FIDs. The analyzer, via an internal pumping system, withdraws gas from the stack. Once inside the analyzer, the gas stream is split and a portion is directed to a FID that measures the total TGO and a portion is directed to a proprietary-design non-methane hydrocarbon cutter. The cutter oxidizes all hydrocarbons except methane. The methane-containing gas stream is then sent to a FID that determines methane concentration. VOCs reported in this report are non-methane hydrocarbons.

3.9 Metals

EPA Method 29 was used to determine metals (Pb and Mn) emissions. The test apparatus consisted of a glass nozzle, a heated glass-lined probe, a heated 83-mm quartz fiber filter, four chilled impingers, and a metering console. The samples were withdrawn isokinetically from the source. Particulate emissions were collected in the probe and on the heated filter, and the

gaseous emissions were then collected in an aqueous acidic solution of hydrogen peroxide in order to measure lead and manganese emissions. The recovered samples were digested and analyzed at the laboratory. Three test runs were performed at the baghouse stack outlet. Figure 3-4 is a schematic of the Method 29 sampling train.

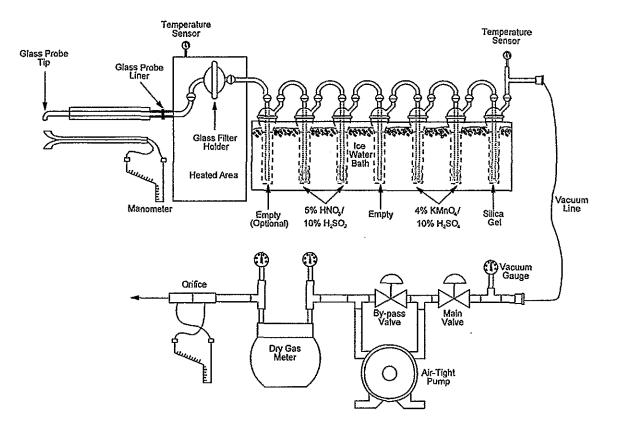


Figure 3-4. Method 5/29 Sampling Train

3.10 Opacity

EPA Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources," was used to measure visible emissions from the C-Blast Furnace baghouse exhaust for the test program. During each particulate measurement run, plume opacity was recorded every 15 seconds (four readings per minute) for 60 minutes.

3.11 Test Comments

1. The methane correction via the 109A analyzer was verbally allowed by MDEQ on site. Methane correction was used on the VOC emissions.

- 2. If EQM had completed a full traverse with the sampling prior to the cast being completed, the traverse was restarted at Point 1. Sampling was continued until the cast was completed. All traverse points sampled were used in the velocity calculations.
- 3. During the first analysis of the metals samples, the Laboratory Control Sample (LCS) and the Laboratory Control Sample Duplicate (LCSD) recoveries were below the laboratory control limits. Therefore, the laboratory reanalyzed the samples. The second analysis set met all of the laboratory QA/QC requirements and was used in the emission calculations. Both sets of analysis are presented in Appendix C. The first analysis of the samples included the audit samples for lead and manganese. The audit results were within the acceptable range and are presented in Appendix C.

4. PROCESS DESCRIPTION/SAMPLING LOCATIONS

Molten iron (hot metal) is produced in the blast furnaces by heating iron ore pellets and other iron-bearing materials, coke, limestone, slag, or other fluxing material. Burden materials consisting of iron ore pellets, flux material (slag, limestone, or dolomite), and a carbon source (usually coke) are delivered to and charged into the top of the furnace. Additional carbon is supplied to the furnace by injecting natural gas and pulverized coal into the hot blast section of the furnace. Preheated combustion (hot blast) air is pushed vertically through the burden material in the furnace from tuyeres located at the bottom of the furnace. The components of the burden chemically react with the hot blast air to reduce the iron oxides into elemental iron and melt. The blast furnace produces molten iron, blast furnace gas, and slag.

Periodically, the molten iron and slag are cast from the furnace into a trough and iron runners in the floor of the casthouse. The slag is separated from the molten iron in the trough prior to entering refractory-lined bottle cars. The slag is then diverted to slag pots. The molten iron is transported in bottle cars to the BOF for use in the steelmaking process.

Emissions generated within the casthouse from the molten iron and slag that are cast from the C Blast Furnace are captured by collection hoods and routed to a baghouse that is used to control particulate emissions from the process. Figure 4-1 presents the sampling location.

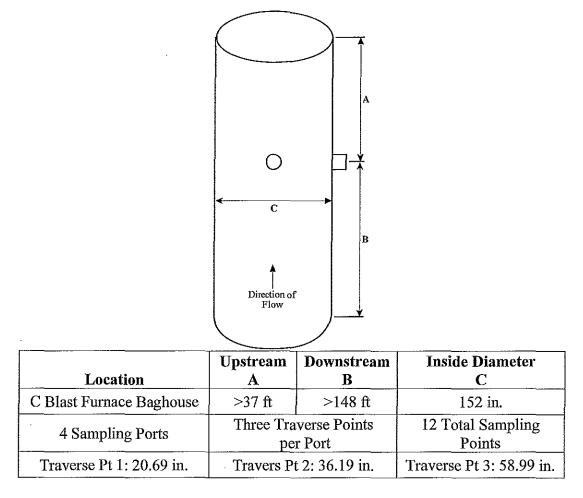


Figure 4-1. Sampling Location

5. QUALITY ASSURANCE AND QUALITY CONTROL

The field sampling quality assurance for this project included the use of calibrated source sampling equipment, reference test methods, and traceability protocols for recording and calculating data. The analytical quality assurance includes use of validated analytical procedures, calibration of equipment, and analysis of control samples and blanks. The calibration and quality control procedures used for this test program are described in the following subsection.

5.1 Calibration Procedures and Frequency

All manual stack gas sampling equipment is calibrated before the start of the test program in accordance with the procedures outlined in the *Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III*, EPA-600/4-72-027B. Table 5-1 is a summary of the stack gas sampling equipment calibrations that are performed in preparation for this project. The meter boxes are re-calibrated after the test.

Table 5-2 lists additional calibration checks performed on the sampling equipment on site, just prior to the testing, to ensure that equipment was not damaged during transport. Table 5-3 details the field checks conducted on the continuous emission monitoring systems before and during the test program.

Equipment	Calibrated Against	Allowable Error
		Y ±0.02 Y
		$\Delta H@ \pm 0.20 \Delta H@$
		post-test
Method 5 meter box	Reference test meter	Y ±0.05 Y
Pitot tube	Geometric specifications	See EPA Method 2
Thermocouple	ASTM-3F thermometer	±1.5%
Impinger (or condenser		
thermometer)	ASTM-3F	±2°F
Dry gas meter thermometer	ASTM-3F	±5°F
Probe nozzles	Caliper	±0.004 in.
Barometer	NBS traceable barometer	±0.1 in. Hg

Table 5-1. Field Equipment Calibration Summary^a

^aAs recommended in the *Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III. Stationary_Source-Specific Methods.* EPA-600/4-77-027b, August 1977.

Table c He - The Cheens of Samphing Equipment	Table 5-2.	Field	Checks	of Samp	ling l	Equipment
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Equipment	Checked Against	Allowable Difference				
Pitot tube	Inspection	No visible damage				
Thermocouples	ASTM 2F or 3F	±1.5%				
Probe nozzles	Caliper	±0.004 in.				

Table 5-3.Field Checks of O2, CO2, CO, NOx, and VOC Analyzers

Calibration	Instrument Check	Acceptable Limit
Initial Calibration	O2, CO2, CO, & NOx Calibration Error, % Span VOC Calibration Error, % Calibration Gas Value	±2% ±5%
	Sampling System Bias	±5% of Span
	O2, CO2, CO, & NOx Calibration Error, % Span	±2%
Daily Calibration	VOC Calibration Error, % Calibration Gas Value	±3%
	O2, CO2, CO, & NOx Drift, % Span	±3% of Span