

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Gerdau MacSteel Monroe	SRN : B7061
Location : 3000 E FRONT STREET	District : Jackson
	County : MONROE
City : MONROE State: MI Zip Code : 48161	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Mike Kovalchick
FCE Begin Date : 10/1/2016	FCE Completion Date : 5/22/2018
Comments : Completed compliance inspection on 04/25/2018 and records review on 5/22/2018. Company has failed to conduct annual mercury testing and annual natural draft openings air inflow testing of the Melt Shop. Their MAP is also out of date.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/07/2018	ROP Other	Compliance	1st Quarter 2018 Continuous Emission Monitoring System (CEMS) Excessive Emissions Reports (EER).
05/02/2018	ROP Other	Compliance	First Quarter, 2018 CO,SO2, and Opacity CEMS Excess Emission and Monitoring. 8 incidents of opacity above three percent. 3 incidents due to broken bags and 5 incidents due to improper COMs alignment which was fixed on 3/19/18. Resolving this issued resulted in higher than normal CEM monitor downtime for opacity monitor.
04/26/2018	Scheduled Inspection	Non Compliance	Inspection of steel mill.
04/26/2018	Other	Non Compliance	Detailed process description notes for Gerdau as of 4/26/2018
04/02/2018	ROP Annual Cert	Compliance	Gerdau had no deviations. Section 2 of the ROP controlled by TMS International reported 1 deviation. They could not locate daily opacity reading records for the month of January. Minor deviation that has been corrected so no compliance action warranted.
04/02/2018	ROP SEMI 2 CERT	Compliance	Gerdau had no deviations. Section 2 of the ROP controlled by TMS International reported 1 deviation. They could not locate daily opacity reading records for the month of January. Minor deviation that has been corrected so no compliance action warranted.

Activity Date	Activity Type	Compliance Status	Comments
04/02/2018	MAERS	Compliance	ROP Cert received 3-15-18, Paper copy of MAERS but AQD able to retrieve unsubmitted electronic version and submit it. EAF's emissions calculated from CEMS and 2016 stack test data. Shows compliance with applicable limits. Company provided numerous spreadsheets that outlined how they calculated emissions similar to how they calculated it for the Gerdau Jackson facility. No compliance concerns.
02/12/2018	MACT (Part 63)	Compliance	Subpart YYYY- Company noted that they accepted scrap from 2 Canadian suppliers that are not part of the National Vehicle Mercury Switch Recovery program. However, both providers have a site specific program for mercury reduction in place.
02/12/2018	ROP Qrtly Cert	Compliance	4th Qt CO CEMS Excess Emission Report, SO2 CEMS Excess Emission Report, Opacity Excess Emission Report. No CO or SO2 emission. 2 incidents of opacity above 3 percent averaged over a 6 minute average. (4.4% and 5.4%) The compartments were isolated and the broken bags replaced so facility back into compliance.
01/02/2018	ROP Qrtly Cert	Compliance	Third Quarter CEMS Excess Emission Report, SO2 CEMS Excess Emission Report, Opacity Excess Emission Report. Showed compliance with all limits.
01/02/2018	Stack Test	Compliance	RATA of CEM system serving the Electric Arc Furnace for flow rate, CO, and SO2.
09/20/2017	ROP Semi 1 Cert	Compliance	Minor issue with furnace pressure reading gauge being plugged and one opacity exceedance of 3.1% over 1 six minute average vs a 3.0% limit due to a torn bag in bag house.
09/20/2017	ROP Other	Compliance	1st and 2nd Qtr 2017 Excess Emission Reports (Opacity), 1st and 2nd Qtr 2017 Excess Emission Reports (CO), 1st and 2nd Qtr 2017 Excess Emission Report (SO2); SA Area Source Report
09/18/2017	ROP Semi 1 Cert	Compliance	Some missing daily records of dust control activities during the month of January.

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08/07/2017	MACT (Part 63)	Compliance	Subpart YYYY. The Company reported that they didn't purchase any car scrap or vehicle scrap during the reporting period.
08/07/2017	ROP Qrtly Cert	Compliance	2nd Quarter CO, Opacity, and SO2 Excess Emission Reports. Some monitor downtime that was related to monitor calibration but no emission exceedances.
07/11/2017	Excess Emissions (CEM)	Compliance	1st Quarter Excess Emissions Reports Facility reported no incidences of CO emission exceedances for the first quarter. The facility reported 7.18 hours of monitor downtime, primarily associated with monitor calibrations.
05/17/2017	MAERS	Compliance	Not much change from previous year as it appears steel production was steady. The emission group with the most emissions...EUMELTSHOP...all the pollutants estimated by stack test or CEMS. 380 tons of CO, 112 tons of NOX, 44 tons of SO2 and 9.4 pounds of mercury. No changes made to Company's MAERS submittal. It appears that they added a slag processing plant to their MAERS submittal since contiguous operation. From ROP Staff report, "In addition to Gerdau Macsteel, Tube City IMS is located on the property of Gerdau Macsteel and has equipment/process with a permit to install for metal recovery through the sizing/sorting of steel slag from Gerdau Macsteel, as well the torch/lance cutting of revert scrap for return to the mill. Tube City IMS supports the main steel making activities of Gerdau Macsteel and meets the regulatory criteria to be considered a single stationary source as defined in R 336.1119 (r)". No other concerns.

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04/20/2017	ROP Annual Cert	Compliance	<p>Postmarked 3/15/17 ROP Cert. for time period under ROP No. MI-ROP-B7061-2009 and PSD 102-12A. Prior to issuance of ROP No. MI-ROP- B7061-2016. The facility reported 5 new deviations for the second half of the year.</p> <p>Reported Deviations: 8/15/16 - High fan amps for 6 minutes of one shift during which time steel was not being produced. 7/15 /16 - 7/17/16 - Daily observations of rooflines were not conducted. Facility has trained more observers to ensure observations are completed. 11/28/16 - East Main Fan amps above limit during midnight shift - High fan amps for 17 minutes during shift during which time steel was not being produced.</p> <p>Deviations appear to have been addressed correctly, no further action at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/20/2017	ROP SEMI 2 CERT	Compliance	<p>Postmarked 3/15/17</p> <p>Reported Deviations: 8/15/16 - High fan amps for 6 minutes of one shift during which time steel was not being produced. 7/15 /16 - 7/17/16 - Daily observations of rooflines were not conducted. Facility has trained more observers to ensure observations are completed. 11/28/16 - East Main Fan amps above limit during midnight shift - High fan amps for 17 minutes during shift during which time steel was not being produced.</p> <p>The facility also reported on deviation that occurred after the issuance of ROP No. MI-ROP-B7061-2016.</p> <p>Deviation Reported: 12/4/2016 - East fan amps below baseline during day shift. Facility reported that the cause was unknown.</p>
04/20/2017	ROP SEMI 2 CERT	Compliance	<p>Postmarked 3/15/17</p> <p>TMS reported that they were only able to locate the records for road emission control for December. Facility stated that they did not receive a copy of the issued ROP until December 15, 2016.</p>
04/20/2017	ROP Annual Cert	Compliance	<p>Postmarked 3/15/17</p> <p>ROP Cert. for the time period of the issuance of ROP No. MI-ROP-B7061-2016.</p> <p>Deviation Reported: 12/4/2016 - East fan amps below baseline during day shift. Facility reported that the cause was unknown.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/07/2017	MACT (Part 63)	Compliance	Semiannual Compliance for Subpart YYYYYY Facility reported no deviations in regards to the scrap requirements of Subpar 5Y. The facility did not purchase scrap from either of their two Canadian suppliers during the reporting period.
03/07/2017	Excess Emissions (CEM)	Compliance	4th Quarter Excess Emissions Report The facility reported that they had zero incidences of excess emission for the reporting period. A total of 1.55 hours of monitor downtime was reported for the period, of which 1.5 was associated with monitor calibrations and 0.05 hours was for non-monitor equipment malfunctions.
03/07/2017	CEM RATA	Compliance	RATA for the exhaust gas flowrate, carbon monoxide, and sulfur dioxide monitors The facility reported that each of the emission test results satisfy the RATA criteria.
12/19/2016	Stack Test	Compliance	Compliance Testing for VOC, PM-10 and PM 2.5
12/01/2016	Excess Emissions (CEM)	Compliance	3rd Quarter Excess Emissions Reports EAF Baghouse Opacity - no exceedances reported, 33 minutes of downtime due to unknown causes EAF SO2 CEMS - No exceedances reported for pound per hour or lb/ton limit. 2.67 hours of downtime due primarily to CEMS calibrations. EAF CO CEMS - no exceedances reported pound per hour, lb./ton or tons per month limits. 5.68 hours of downtime due primarily to CEM excess drift issues. Quarterly cylinder gas audit - The CO and SO2 analyzers met the acceptability criteria.

Name: M. Kovalchuk

Date: 5/22/2018

Supervisor: 