

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2305-AOP-R3 AFIN: 47-00991

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Big River Steel LLC
2027 E. State Hwy 198
Osceola, Arkansas 72370

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Iron and Steel Mills and Ferroalloy Manufacturing
NAICS Code: 33111

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
12/19/2018	Administrative Amendment	Added changes to engines that were made during the public comment period in the previous revision.

6. REVIEWER'S NOTES:

Big River Steel, LLC owns and operates a steel mill located at 2027 E. State Hwy 198 in Osceola, AR. This permitting action is an administrative amendment to correct the previous final permit. The previous permit did not include changes made during the comment period. Those changes are as follows. The emission limits and BACT limits have been updated for SN-05-SN-11, SN-16, SN-17, and SN-39. These units have also been removed from the testing requirements in Specific Conditions #53 and #70. Permit

condition #26 has also been updated to remove the requirement for monthly submittal and to clarify the recordkeeping portion of the requirement for tons of steel tapped from the EAFs.

The permitted emission changes from this amendment are as follows: an increase of 4.4 tpy PM, an increase of 4.5 tpy PM10, and an increase of 4.5 tpy PM2.5.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility has some active/pending compliance issues for the air permit in regards to testing, reporting, and recordkeeping. This permitting action addresses some of the enforcement concerns by updating some sources limits due to testing results and adding the gasoline storage tank and dispensing operation to the permit.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? Y
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01 and 02	Particulate	NSPS AAa
01 and 02	HAPs	MACT YYYYYY
All Boilers	None	NSPS Dc
SN 53	VOC	NSPS TT
All	NO _x , CO, PM, PM ₁₀ , PM _{2.5} , SO ₂ , VOC, lead, and greenhouse gasses.	PSD
Generators	Criteria and HAPs	NSPS IIII, and MACT ZZZZ
100	HAP	NESHAP CCCCCC

10. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N
 (Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

The facility was required to do PSD modelling for all criteria pollutants in the initial application. The facility performed modelling again during this modification for PM₁₀ and PM_{2.5}. Refer to the permit for the results of the modeling.

b) Non-Criteria Pollutants:

Non-Criteria Pollutant evaluation based off the R0 results as all HAP emission rates have either remained the same or decreased.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Formaldehyde	15	1.65	0.1236	Yes
Arsenic	0.01	0.0011	0.0043	No
Cadmium	0.01	0.0011	0.00583	No
HCl	3	0.33	1.0	No
Manganese	0.2	0.022	0.161	No
Mercury	0.01	0.0011	0.061	No

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each

compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Arsenic	0.1	0.049	Yes
Cadmium	0.1	0.0003	Yes
HCl	30	0.0007	Yes
Manganese	2	0.012	Yes
Mercury	0.1	0.0043	Yes

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y

If exempt, explain: No H₂S emissions

Pollutant	Threshold value	Modeled Concentration (ppb)	Pass?
H ₂ S	20 parts per million (5-minute average*)	0	Y
	80 parts per billion (8-hour average) residential area	0	Y
	100 parts per billion (8-hour average) nonresidential area	0	Y

*To determine the 5-minute average use the following equation

$$C_p = C_m (t_m/t_p)^{0.2} \text{ where}$$

C_p = 5-minute average concentration

C_m = 1-hour average concentration

t_m = 60 minutes

t_p = 5 minutes

13. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
All	All criteria pollutants based on BACT limits				
01 and 02 HAPs	AP-42	Varied	Baghouse	99%+	
Natural Gas HAPs	AP-42	Varied	None		
Pickling Lines HCl	Manufacturer Estimates	Varied	Scrubbers		
100	TANKS 4.0 software				

14. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01 and 02	PM, PM ₁₀ , PM _{2.5}	5D and 201 or 201A	Initial and annual	NSPS and PSD limit verification
01 and 02	AAa required information (fan motor amps, etc)	None specified	Initial and annual	NSPS requirement
01 and 02	NO _x , SO ₂ , CO, CO ₂ , VOC	7E, 6C, 3A, 10, 25A	Semi annually	To verify compliance with BACT emission rates
01 and 032	Lead	12	Annually	To verify BACT limits
04, 22, 26, 27	PM _{2.5} , CO, NO _x	202, 10, 7E	Initial and 5 years	Verification of BACT emission limits
03	Flare design	40 CFR 60.18(b) through (f)	Initial only	To verify flare is design is capable of achieving BACT limits
03	CO ₂	Material analysis	Semi Annually	To show compliance with BACT limits
05-09 10-11 12-13 16-19 20-21	PM _{2.5} and PM ₁₀	202, 10, and 7E	Initial	To show compliance with BACT limits

SN	Pollutants	Test Method	Test Interval	Justification
28-29 39 51, 58, 60 53 54-56				
53	VOC	25A	Initial	NSPS TT Requirement
Cooling Towers	TDS	TDS testing	6 months	Verification of BACT limits
Pickling Line Scrubbers	HCl	26	Initial	Verification of permit limits and ensure facility is not a Major Source of HAPs

15. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01 and 02	AAa required monitoring	Fan amps, damper positions, etc...	Vary according to reading	Y
52	RTO temperature	Thermocouple	Continuous (3hr averages)	Y

16. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01 and 02	Steel Throughput	3.4 million	Monthly	Y
01 and 02	AAa Records	None	Vary	Y
01 and 02	YYYYY Records	None	Vary	Y
03	Degasser steel throughput	1,500,000 tons per 12 months	Monthly	Y
52	Subpart TT Records	None	Vary	Y
25, 38, 44, 45, 46	Hours of	6080	monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	operation			
Emergency Engines	Hours of operation	100	Monthly	Y
Cooling Towers	TDS readings	Vary per tower	Semi annually	Y
82, 84, 86, 88, 90	Materials received	175,830 49,210 175,830 680,000 680,000	Monthly	Y
100	Gasoline Throughput	Less than 10,000 gallons per month	Monthly	Y

17. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01 and 02	3%	NSPS/BACT	Daily observations
01 and 02 Meltshop	6%	NSPS/BACT	Daily observations
All natural gas burners	5%	BACT/Department Guidance	Combustion of natural gas only
91	5%	BACT/Department Guidance	Weekly Observation
Rolling Mill sources	5%	BACT/Department Guidance	Weekly Observation on building

18. DELETED CONDITIONS:

Former SC	Justification for removal
18	The facility installed a bag leak detection system that does not require this visual inspection to occur. To perform this inspection, they must shut down SN-01 and SN-02 and manually climb into and inspect each chamber of the baghouse.
29 and 30	The facility has elected not to install CEMs and has requested that the conditions giving the option to install them be removed.

19. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)							
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs		Lead
							Single	Total	
Reformer	A-1	0.08	0.003	0.06	0.03	0.09	8.37	0.001	5.50

Furnace (PHG250)							E-04		E-06
Water Bath Vaporizer	A-1	0.30	0.02	0.22	4.37	2.39	2.90 E-03	0.004	1.93 E-06
Tundish Dryer	A-1	0.30	0.02	0.21	1.46	3.19	2.90 E-03	0.004	1.93 E-05
Continuous Galvanizing Line Dryer	A-1	0.20	0.02	0.15	2.99	4.26	2.00 E-03	0.003	1.33 E-05
Diesel Fuel Tank	A-3	-	-	0.0013	-	-	-	-	-
Engine Oil Tank	A-3	-	-	1.3 E-05	-	-	-	-	-
Steel Cutting	A-7	0.4	-	-	-	-	0.001	0.002	-
Induced Draft Mechanical Cooling Tower	A-13	0.56	-	-	-	-	-	-	-

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2305-AOP-R2

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Big River Steel LLC
 Permit #: 2305-AOP-R3
 AFIN: 47-00991

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	1935.1
Permit Type	AA	Permit Fee \$	0

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	3.5
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		241.3	244.7	3.4		
PM ₁₀		323.3	326.8	3.5	3.5	326.8
PM _{2.5}		317.3	320.8	3.5		
SO ₂		350.7	350.7	0	0	350.7
VOC		194.6	194.6	0	0	194.6
CO		3942	3942	0		
NO _x		1058.9	1058.9	0	0	1058.9
Lead	<input type="checkbox"/>	0.963498	0.963498	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Arsenic	<input type="checkbox"/>	0.013346	0.013346	0		
Cadmium	<input type="checkbox"/>	0.017696	0.017696	0		
Formaldehyde	<input type="checkbox"/>	0.4383	0.4383	0		
HCl	<input checked="" type="checkbox"/>	3.5	3.5	0	0	3.5
Manganese	<input type="checkbox"/>	0.602715	0.602715	0		
Mercury	<input type="checkbox"/>	0.201755	0.201755	0		
H ₂ SO ₄	<input checked="" type="checkbox"/>	0.6	0.6	0	0	0.6