



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

July 31, 2009

Mr. Gerardo C. Rios
Chief, Permits Office
U.S. EPA Region IX AIR-3
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Rios:

Subject: California Steel Industries, Inc. (ID 46268)

The subject facility has proposed to revise their Title V permit by updating the burner description for Furnace No. 5 (D202). The proposed permit revision is considered as a "minor permit revision" to the initial Title V permit. Enclosed for your review are the permit evaluation and proposed permit for the permit revision. With your expected receipt of the proposed Title V permit revision today, we will note that the EPA 45-day review period begins on July 31, 2009.

If you have any questions or need additional information regarding the proposed permit revision, please call Dixie Richards at 909/396-2395.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian L. Yeh', is written over a horizontal line.

Brian L. Yeh
Senior Manager
Chemical and Mechanical Operations

BLY:DR

Enclosures

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3 : STEEL ANNEALING OPERATION					
FURNACE, SLAB #5, NATURAL GAS, CORE FURNACE SYSTEMS, MODEL CUSTOM BUILT, STEEL REHEAT, WITH LOW NOX BURNER, 529.4 MMBTU/HR WITH A/N: 469832 Permit to Construct Issued: 01/25/08 BURNER, TOP PREHEAT, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TSX18, SIDE FIRED, 6 TOTAL; 15.5 MMBTU/HR BURNER, BOTTOM PREHEAT, NATURAL GAS, TECNINT TECHNOLOGIES, MODEL TSX20, SIDE FIRED, 6 TOTAL; 18.5 MMBTU/HR BURNER, TOP HEAT, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TSX20R2, REGENERATIVE TYPE, WITH 4 BURNER PAIRS, 80 MMBTU/HR TOTAL, 20 MMBTU/HR	D202	C209	NOX: MAJOR SOURCE**	CO: 2000 PPMV NATURAL GAS (1) [RULE 407,4-2-1982] ; NOX: 101.4 PPMV NATURAL GAS (3) [RULE 2012,12-7-1995;RULE 2012,5-11-2001] NOX: 50 PPMV NATURAL GAS (4) [RULE 2005,5-6-2005] ; PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981] ; PM: (9) [RULE 404,2-7-1986]	B59.3, C1.27, D12.7, D29.4, D82.1, D323.1, E147.1

* (1)(1A)(1B) Denotes RECLAIM emission factor
 (2)(2A)(2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5)(5A)(5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3 : STEEL ANNEALING OPERATION					
BURNER, BOTTOM HEAT, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TSX20R1, REGENERATIVE TYPE, WITH 4 BURNER PAIRS, 80 MMBTU/HR TOTAL, 20 MMBTU/HR					
BURNER, TOP HEAT #2, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TSX14R2, REGENERATIVE TYPE, WITH 4 BURNER PAIRS, 44 MMBTU/HR TOTAL, 11 MMBTU/HR					
BURNER, BOTTOM HEAT #2, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TSX14R1, REGENERATIVE TYPE, WITH 4 BURNER PAIRS, 44 MMBTU/HR TOTAL, 11 MMBTU/HR					
BURNER, TOP SOAK, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TRX 4, RADIANT ROOF, 30 TOTAL; 0.98 MMBTU/HR					

* (1)(1A)(1B) Denotes RECLAIM emission factor
 (2)(2A)(2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5)(5A)(5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8)(8A)(8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3 : STEEL ANNEALING OPERATION					
BURNER, BOTTOM SOAK, NATURAL GAS, TECHINT TECHNOLOGIES, MODEL TS12, END FIRED, 6 TOTAL; 8 MMBTU/HR					
SELECTIVE CATALYTIC REDUCTION, ENVIRO-KINETICS, USING HALDOR TOPSOE DNX-930 CATALYST, 743 CU.FT. WITH A/N: 469831 Permit to Construct Issued: 01/25/08 AMMONIA INJECTION, AQUEOUS AMMONIA, 19 %, AMMONIA HANDLING SYSTEM HEAT EXCHANGER, HEAT RECOVERY STEAM GENERATOR	C209	D202		NH3: 10 PPMV (4) [RULE 1303(a)(1)-BACT,5-10-1996] PM: (9) [RULE 404,2-7-1986]	C6.3, C6.9, K67.8
Process 5 : ABRASIVE BLASTING					
System 2 : SURFACE PREPARATION					
PLASMA ETCHER, ELECTRO DISCHARGE TEXTURING UNIT, SARCLAD, STEEL ROLLS, 72 ELECTRODES A/N: 437349 Permit to Construct Issued: 12/02/05	D223	C224		PM10: (9) [RULE 405,2-7-1986]	C1.22, D29.3, D323.2, E71.19

- | | |
|---|--|
| <p>* (1)(1A)(1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5)(5A)(5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits</p> | <p>(2)(2A)(2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)
 (10) See Section J for NESHAP/MACT requirements</p> |
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** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 5 : ABRASIVE BLASTING					
MIST ELIMINATOR, THREE-STAGE, TORIT A/N: 437350 Permit to Construct Issued: 12/02/05	C224	D223 C225			D322.3
FILTER, HEPA FILTER, DELTA, 430 SQ.FT.; 2 BAGS A/N: 437350 Permit to Construct Issued: 12/02/05	C225	C224 C226			D322.3
CARBON ADSORBER, 2 CANISTERS CONNECTED IN SERIES, EACH WITH 2000 LBS, CALGON, GRANULATED ACTIVATED CARBON A/N: 437351 Permit to Construct Issued: 12/02/05	C226	C225			D90.2, E128.1, E153.1

- | | |
|--|---|
| <ul style="list-style-type: none"> * (1)(1A)(1B) Denotes RECLAIM emission factor (3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit (7) Denotes NSR applicability limit (9) See App B for Emission Limits | <ul style="list-style-type: none"> (2)(2A)(2B) Denotes RECLAIM emission rate (4) Denotes BACT emission limit (6) Denotes air toxic control rule limit (8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.) (10) See Section J for NESHAP/MACT requirements |
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** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
CALIFORNIA STEEL INDUSTRIES INC**

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
CALIFORNIA STEEL INDUSTRIES INC**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
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FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F10.1 Material(s) that contain the following compound(s) shall not be used in this facility;

0.004 percent or more of arsenic and 0.002 percent or more of cadmium by weight

No scrap other than clean non-ferrous scrap or rerun scrap shall be melted at this facility

[RULE 1407, 7-8-1994]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

PROCESS CONDITIONS

P28.1 Except for diesel transfers, Phase I vapor recovery systems shall be in full operation whenever fuel is being transferred into storage tanks.

Except for diesel transfers, Phase II vapor recovery systems shall be in full operation whenever fuel is being transferred into motor vehicles, as defined in Rule 461.

All Phase I and Phase II vapor recovery equipment at this facility shall be installed, operated and maintained to meet all California Air Resources Board certification requirements.

[RULE 461, 1-9-2004; RULE 461, 6-3-2005; RULE 461, Hasstech Conditions, 1-9-2004]

[Processes subject to this condition : 15]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

B59.3 The operator shall not use the following material(s) in this device :

metal contaminated with rubber, plastics, paper, rags, oil, grease

flourides, chlorine, aluminum chloride, or similar smoke-producing material

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001**]

[Devices subject to this condition : D202]

C. Throughput or Operating Parameter Limits

C1.22 The operator shall limit the production rate to no more than 500 hour(s) in any one calendar month.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : D223]

C1.27 The operator shall limit the natural gas fuel usage to no more than 425.01 MM cubic feet in any one calendar month.

This limit shall be based on the total combined limit for equipment D133 and D202.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2005, 5-6-2005**]

[Devices subject to this condition : D202]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

- C6.3 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 6 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the SCR system bed.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C209]

- C6.9 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 800 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature reading device to accurately indicate the temperature across the SCR system bed.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C209]

D. Monitoring/Testing Requirements

- D12.7 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the flow rate in the fuel supply line.

The fuel meter shall be common to both D133 and D202.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D202]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D29.3 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
VOC emissions	Approved District method	District-approved averaging time	Outlet of the APC equipment serving this equipment
PM10 emissions	Approved District method	District-approved averaging time	Outlet of the APC equipment serving this equipment

In addition to the source test requirements of Section E of this facility permit, notify the District of the date and time of the test at least 10 days prior to the test.

The test(s) shall be conducted within 60 days after achieving maximum production rate, but no later than 120 days after initial start-up.

The test shall be conducted during maximum production rates.

Maximum production rate will consist of the maximum roll size and maximum surface roughness

Notwithstanding the requirements of Section E conditions, the source test results shall be submitted to the District no later than 30 days after the source test was conducted.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D223]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D29.4 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
PM10 emissions	Approved District method	District-approved averaging time	Outlet
NOX emissions	Approved District method	District-approved averaging time	Inlet and outlet of APC equipment serving this equipment
NH3 emissions	Approved District method	District-approved averaging time	Outlet of the SCR serving this equipment

In addition to the source test requirements of Section E of this facility permit, notify the District of the date and time of the test at least 10 days prior to the test.

The test(s) shall be conducted within 90 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The test shall be conducted during maximum production rates.

The test shall be conducted to demonstrate compliance with BACT emission limit for NH3 and NOx; and to determine offset requirements for PM10.

Notwithstanding the requirements of Section E conditions, the source test results shall be submitted to the District no later than 60 days after the source test was conducted.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D202]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D82.1 The operator shall install and maintain a CEMS to measure the following parameters:

NOX concentration in ppmv

The CEMS shall be installed prior to start-up. The operator shall certify the CEMS within 180 days after start-up. During this 180 day period the operator shall comply with the monitoring and reporting requirements of Rule 2012(h)

[RULE 2012, 12-5-2003; RULE 2012, 1-7-2005]

[Devices subject to this condition : D202]

D90.2 The operator shall monitor and record the VOC concentration at the outlet of the carbon canister according to the following specifications:

The operator shall record the parameter requested once every shift

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : C226]

D322.3 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C224, C225]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D202]

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarter. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D223]

E. Equipment Operation/Construction Requirements

FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

E71.19 The operator shall only operate this equipment if both the HEPA filter with Torit Dryflo Mist Eliminator and the Carbon Absorber are fully operational.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D223]

E128.1 The operator shall keep all spent carbon in a tightly covered container which shall remain closed except when it is being transferred into or out of the container.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C226]

E147.1 The operator shall not conduct fluxing or refining in this equipment.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D202]

E153.1 The operator shall change over the carbon in the adsorber whenever breakthrough occurs.

For the purpose of this condition, breakthrough shall be defined as a condition when the built-in indicator installed in the carbon canister changes color, as suggested by the manufacturer.

The operator shall inspect and record the condition of the built-in carbon indicator once every shift.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C226]

K. Record Keeping/Reporting

**FACILITY PERMIT TO OPERATE
CALIFORNIA STEEL INDUSTRIES INC**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

daily recording of ammonia flow

daily recording of ammonia/NOx ratio

[RULE 2012, 12-5-2003; RULE 2012, 1-7-2005; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C209]

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EQUIPMENT DESCRIPTION

APPLICATION NO. 500743

STEEL REHEAT FURNACE #5, D202, WITH 80 BURNERS, TECHINT TECHNOLOGIES, 529.4 MMBTU/HR TOTAL

APPLICATION NO. 500744

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

A permit to construct new reheat furnace #5 was issued 1/23/08 (A/N 469832), with 89 Techint Technologies burners, total rating of 529.44 mmbtu/hr. The company has decided to install different burners, including regenerative burners (burner pairs operating alternately) in zones 1 and 2 (top and bottom), with a total furnace rating of 529.4 mmbtu/hr. The furnace is to be vented to an SCR. No change to burner emissions, fuel limit or control is proposed. However, company expects lower NOx emissions with the new burners, since some of the burners are regenerative.

They also asked for a change of condition to allow operation without the SCR for 7-10 days while drying out the refractory. During this period, the temperature is expected to be outside the SCR's operating window. No steel will be processed during that period. Management did not agree, and it was suggested that the company could file for a variance.

PROCESS DESCRIPTION

See P/C evaluation under A/N 469832.

EMISSION ESTIMATES

New furnace #5 has a combined fuel limit with existing Furnace #4. The fuel limit is the same, with no change in emissions as calculated in the original evaluation.

RULE COMPLIANCE

Rule 212: Standards for approving permits

This burner modification does not result in any increase in emissions, and will not trigger a new notification.

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Rules 401, 402, 404, 405, 407, 1401

Compliance is expected. See original permit to construct evaluation.

New Source Review

BACT

Achieved in practice BACT is natural gas combustion and low NOx burners \leq 50 ppm (permit limit). The company has proposed installing SCR, with expected controlled emissions of 15 ppm NOx or less, 10 ppm ammonia slip.

Burners alone are expected to have emissions of 49 ppm NOx. Even without the SCR, compliance with BACT requirements is expected.

Air Quality Modeling

Compliance is expected even without the SCR.

Emissions Offsets

Company purchased PM10, ROG and SOx. Fuel usage limit is the same; no increase in emissions from the change in burners. Additional offsets are not required.

Fuel usage is expected to be much lower during the refractory drying out period, but company did not know what that amount would be. The furnace will have NOx CEMS.

Rule 3000 – Title V

There is no increase in emissions due to the proposed change in burners. The burner modification is a minor permit revision, and does not require a new public notice. EPA review is required.

RECOMMENDATION

Compliance with all applicable rules and regulations is expected. A conditional permit to construct is recommended after EPA notice.