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OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **February 5, 2025**

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Compliance and Enforcement Group Manager

THROUGH: Eric L. Milligan, P.E., Manager, Engineering Section

THROUGH: Ryan Buntyn, P.E., New Source Permits Section

FROM: David Schutz, P.E., New Source Permit Section

SUBJECT: Evaluation of Permit Application No. **2015-0643-TV**
Commercial Metals Company
Greenfield Steel Mill (FAC ID 14935)
Sec. 34 – 6S – 9E
Durant, Bryan County, Oklahoma
Intersection of Old US-70 and McLean Road
Latitude: 33.98073^{o}, Longitude -96.34674^{o}

SECTION I. INTRODUCTION

Commercial Metals Company (CMC) has submitted an application for an initial Part 70 operating permit for a greenfield steel mill located at Durant (SIC 3312). The facility is a major source for PSD and an area source of HAPs. The facility is operating under Permit No. 2015-0643-C (M-1) which was issued November 30, 2023.

Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements. Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in Section III.

SECTION II. PROCESS DESCRIPTIONS

In this steel mill, CMC manufactures steel products from scrap steel. Iron ore is not processed at the mill.

In the CMC mill, scrap metal is transported into the facility to be used as feedstock for the Melt Shop. In the Melt Shop, ferrous metal is fed into the Electric Arc Furnace (EAF). Steelmaking is accomplished using electrical energy, with a melting temperature within the EAF of approximately 3,000 °F. Furnace off-gases, also at 3,000 °F, are captured by a direct evacuation control (DEC) system and used to pre-heat the scrap being brought to the furnace.

Additionally, a large canopy hood at roof level over the furnace collects EAF emissions not captured by the DEC system as well as emissions from small incidental sources in the Melt Shop. All off-gases, either from the scrap pre-heating or the canopy hood, are directed to a large fabric filtration baghouse before being released to the atmosphere. During the melting process, other raw materials are added to the EAF to remove impurities from the steel. Once the molten steel reaches the desired conditions, it is transferred to a large refractory-lined vessel known as a ladle, which will be transported to the Ladle Metallurgy Station (LMS).

At the LMS, the steel within the ladle is subjected to additional heating by electrical energy to maintain its molten state and is further refined by injection of raw materials. Once the molten steel reaches the desired temperature and chemistry, the ladle is transported to a continuous caster, where the steel is poured into a refractory-lined surge vessel called a tundish and subsequently into a water-cooled mold.

As the steel passes through the mold in the caster, it is cooled and formed into a continuous square cross section-shaped strand. After casting, the continuous steel strand is rolled to the desired shape, i.e., structural rebar, in a rolling mill. After rolling, the steel is cooled, bundled, and stored. To produce some structural material such as angles and channels, the rebar is unbundled and passed through a straightener roller process. The finished products are shipped off-site by truck as needed for use by customers.

A low-density mixture of impurities called slag is formed in the EAF and LMS during the melting and refining processes. The slag generated in these processes is transferred to a processing area, where it is air cooled, processed, and transported off-site by truck for sale to customers.

Ancillary sources that are required to support the proposed operations and that will generate small quantities of emissions include the following:

- Manual torch cutting of scrap material
- Handling and storage of raw materials used in the EAF and LMS
- Handling and storage of lubrication products used in the caster mold
- Refractory replacement and refractory curing and drying using natural gas-fired dryers
- Handling and storage of raw materials used to rebuild and repair refractory
- Spent refractory handling and storage
- Ladle and tundish preheating using natural gas-fired preheaters
- Mill scale handling and storage
- Handling and storage of residual scrap/sweepings
- Cooling towers
- Roads

The following sections contain a detailed description of the processes proposed for the CMC mill.

Scrap Material Storage and Handling

Scrap steel for the CMC mill is purchased from outside suppliers and transported to the facility by both trucks and rail. Scrap material received may include shredded scrap automobiles, used appliances, machinery, sheet metal, rectangular bundles, and miscellaneous scrap metal. Scrap materials arrive in "pre-processed" form suitable for direct use in the steelmaking process.

Scrap material is primarily stored: (1) inside a partially enclosed building in which scrap is loaded to a conveyor for transport to the EAF, and (2) outdoors in piles for ultimate transport to the scrap storage building. Incoming trucks enter one of several bays on the receiving side of the scrap material storage building. The trucks dump their load of scrap onto the concrete floor. Cranes and mobile equipment transport to the storage building scrap received by rail or stored in outdoor storage piles, manage the piles of scrap within the building, and load scrap onto the conveyor that feeds the EAF.

The outdoor scrap material storage piles receive material when space within the scrap material storage building is inadequate. Trucks hauling scrap material are able to dump their load adjacent to the outdoor piles. Cranes and mobile equipment transport scrap received by rail to the outdoor piles and manage material at the piles.

Relatively small amounts of PM emissions are generated from scrap storage and handling from the following sources:

- Outdoor scrap handling and storage (Emission Unit Identification Number (EUN) SCRAPHNDLG and Emission Point Identification Number (EPN) SCRAPYARD)
- Scrap handling and storage at the Scrap Storage Building (EUN SCRAPBLDG and EPN SCRAPBLDG)
- Outdoor handling and storage of residual scrap and sweepings (EUN SWEEPHNDLG and EPN SCRAPYARD)
- Paved roads (EUN ROADS and EPN ROADS)
- Unpaved roads (EUN ROADS and EPN ROADS)

Additionally, a small fraction of the total scrap material received require manual gas-fired torch cutting (EUN SCRAPCUT and EPN SCRAPCUT) to ensure its manageability. Relatively small amounts of emissions of PM and combustion products are generated from torch cutting.

Other Raw Material Storage and Handling

Various raw materials are purchased from outside vendors and stored and handled at the plant site prior to use in the steelmaking process. These materials include:

- Carbon to be used as a reductant in the steelmaking process
- Fluxing agents for the production of slag
- Alloys for refining steel metallurgy

The carbon is transported by truck or rail to the site and is pneumatically unloaded to an outdoor storage silo. The receiving hopper and silo are controlled by bin vent filters to reduce PM emissions from material transfers. The carbon is pneumatically transferred from the storage silo to the EAF and LMS as needed.

The fluxing agents is transported to the site in trucks and pneumatically unloaded to outdoor storage silos. The receiving hopper and storage silos are equipped with bin filters vents to reduce PM emissions from material transfers. The fluxing agents are pneumatically transferred from the storage silos to the Melt Room of the Melt Shop building for use in the EAF and LMS as needed.

Alloys are transported by truck to the facility in aggregate form and unloaded onto outdoor storage piles. The alloys are transferred by front-end loaders to the Melt Room as needed for addition to ladles when transferring molten steel from the EAF and for addition to ladles at the LMS.

Relatively small amounts of PM emissions may be generated during raw material storage and handling from the following sources:

- Carbon handling and storage system (EUN CARBHNDLG and EPNs CARBHOPPER and CARBSILO1)
- Fluxing agent handling and storage system (EUN FLUXHNDLG and EPNs FLUXHOPPER, FLUXSILO1, and FLUXSILO2)
- Alloy aggregate handling and storage outside the Melt Shop building (EUN ALLOYHNDLG and EPN ALLOYPILES)
- Alloy aggregate handling and storage inside the Melt Room (EUN ALLOYMELT and EPN MELTBH)
- Paved roads (EUN ROADS and EPN ROADS)

EAF Melting and Refining Operations

To initiate the steelmaking process, scrap material is placed into the EAF. The EAF is designed to continuously receive scrap material using a conveyer system. The conveyer system will allow for continuous feeding of scrap material to the EAF without opening the roof of the furnace. During start-ups of the EAF, maintenance of the EAF scrap conveyor system, and other mechanical outages the loading of scrap will be accomplished using charge buckets, which are transported into position over the EAF using overhead cranes. Once a charge bucket is in position, the furnace roof will pivot to the side, and the scrap will be charged to the furnace.

Once charging is complete, the furnace roof is re-positioned, and the furnace electrodes are lowered. Electrical power is then provided to increase the temperature of the entire charge of scrap to beyond the steel melting point of approximately 3,000 degrees Fahrenheit (°F).

During the melting process, fluxing agents are used to remove impurities from the steel through the formation of slag. Oxygen and reducing agents are injected to make the slag foam via the formation of CO_2. The low-density slag provides insulation to reduce energy losses and improve energy transfer during the melting process.

After the first batch ("heat") of steel is melted, scrap for subsequent heats is fed to the EAF using a conveyer. The conveyer system allows the continuous feeding of scrap material to the EAF without opening the roof of the furnace.

Once the steel melting and refining in the EAF is complete, the contents of the furnace are poured ("tapped") into a refractory-lined vessel known as a ladle, which transports the molten steel to the LMS for further refining. A "heel" of molten steel remains in the furnace after the furnace has been tapped in order to assist in the melting of the subsequent heat's scrap charges.

EAF emissions are generated during charging, melting, refining, and tapping. In general, when the furnace roof is closed, at least 99% of the EAF emissions are captured by a direct evacuation control (DEC) system, which is vented through a large diameter air-cooled duct to the Melt Shop baghouse (EPN MELTBH). When the furnace roof is open, all of the emissions are captured by the building enclosure in combination with the canopy hood above the EAF, which also vents to the Melt Shop baghouse. Based on experience from other CMC mills currently in operation throughout the United States and on the proposed Melt Room ventilation design, 100% of the emissions generated by the EAF are captured by either the DEC system or by the building enclosure/canopy hood configuration, which then vents the emissions to the Melt Shop baghouse.

During EAF charging, PM, VOC, CO_2, and CO emissions are generated by the volatilization and partial combustion of grease, oil, plastics, and paper attached to the scrap. Some PM emissions are generated from the release of loose iron oxide (rust) particles on the scrap. Except for the cold starts that happen after maintenance events, usually once a week, all of the heats in the EAF are charged with scrap with the DEC roof in place and therefore exhaust charging emissions generated in the EAF directly to the Melt Shop baghouse. When the EAF is charged using charge buckets all of the emissions generated are captured by the building enclosure/canopy hood configuration, which will then direct the emissions to the Melt Shop baghouse.

Melting and refining emissions include PM, CO, NO_x, SO_2, and small quantities of VOC. PM is generated from the release of loose iron oxide (rust) particles on the scrap, condensation of volatilized lower-boiling metals, and incomplete combustion of carbon-containing materials charged to the furnace. CO is also emitted as a result of incomplete combustion of carbon-bearing materials charged to the furnace and incomplete combustion of carbon in the furnace electrodes. NO_x emissions are formed within the EAF during melting as a result of the elevated temperatures within the EAF. During melting, SO_2 is generated within the furnace due to oxidation of sulfur contained in the combustibles. VOCs not oxidized during charging of the furnace are oxidized during melting. During melting and refining, the furnace roof is closed, and emissions are controlled by the DEC system, which is vented through a large diameter air-cooled duct to the Melt Shop baghouse. Any emissions that may escape the DEC are captured by the building enclosure/canopy hood configuration, which routes the emissions to the Melt Shop baghouse.

Emissions during EAF tapping operations includes smaller quantities of PM, CO, and SO_2. PM emissions will result from fumes generated by the molten steel and the addition of alloys while the steel is being tapped into a ladle. CO and SO_2 form as a result of oxidation of a portion of the residual carbon and sulfur in the molten steel. All of the emissions from tapping are captured by the building enclosure/canopy hood configuration, which will route the emissions to the Melt Shop baghouse.

EAF dust collected in the Melt Shop baghouse is pneumatically transferred to a storage silo, which is equipped with a bin vent filter (EPN DUSTSILO1) to minimize emissions from the transfer of dust.

The dust is loaded into trucks and/or railcars beneath the silo in a building enclosure in order to be transported to off-site recycling facilities. Small levels of PM emissions may escape the enclosure during the transfer of dust to trucks and/or railcars (EPN DUSTBLDG).

Emission points associated with the EAF (EUN EAF) will include the following:

- EAF operations (EUN EAF and EPN MELTBH)
- Handling, storage, and load-out of Melt Shop baghouse dust (EUN DUSTHNDLG and EPNs DUSTSILO1 and DUSTBLDG)

LMS Refining Operations

The EAF is used primarily for melting scrap material and, to a lesser degree, for refining steel. Once the steel reaches the desired conditions, it is tapped into a ladle to be transported to the LMS. At the LMS (EUN LMS), the ladle is connected to a ladle furnace roof, which contains electrodes for further electrical heating. The injection of additional raw materials also occurs in the LMS.

LMS contaminants which may be emitted include PM, CO, NO_x, SO_2, VOC, and GHG. PM emissions are generated primarily from iron oxides in steel and metal fumes. PM emissions from the LMS are expected to be lower than PM emissions from the EAF because the steel is already in molten form and the low-vapor point metals will have already been volatilized. Additionally, some reduction of emissions result from the filtering effect of the slag layer, which will float on the molten steel bath.

An air-cooled duct connected to the LMS roof vents emissions from the LMS to the Melt Shop baghouse (EPN MELTBH). As with the EAF, all emissions generated in the LMS are captured by either its DEC system or the building enclosure/canopy hood configuration, which then directs the emissions to the Melt Shop baghouse.

Ladle Preheating and Ladle Repair/Rebuilding

Ladles are lined with refractory and preheated before being used. The ladle preparation area, which is located in the Caster Room of the Melt Shop building, consists of refractory dryers and preheaters. Both the dryers and preheaters are natural-gas fired. Combustion emissions are released during preheating and refractory drying of ladles.

Ladle refractory installation and its occasional repair and replacement may involve the use of organic binding agents, which can generate small quantities of CO, PM, and VOC emissions from pyrolysis of the binders. In addition, low-level PM emissions may be generated from the removal of spent refractory. Emissions from the ladle preheaters and ladle relining activities are all assumed to be released from the building uncaptured through the caster roof vent (EPN CASTERVENT).

Emission sources associated with ladle preheating and ladle refractory repair and rebuilding processes will include the following:

- Ladle preheating (EUN LADLEPHEAT and EPN CASTERVENT)
- Ladle refractory drying (EUNs LADLEDRYER and EPN CASTERVENT)
- Spent ladle refractory handling in the Caster Room (EUN REFRCCASTR and EPN CASTERVENT)

- Outdoor spent ladle refractory handling and storage (REFRCHNDLG and EPN SLAGYARD)
- Paved roads (EUN ROADS and EPN ROADS)
- Unpaved roads (EUN ROADS and EPN ROADS)

Casting Operations

Once the molten steel reaches the desired properties in the LMS, the ladle is removed and transported by overhead crane to a continuous casting machine located in the Caster Room. In the Caster, steel flows via a bottom slide gate from the ladle into another refractory-lined surge chamber called a tundish. From the tundish, the molten steel flows into the lubricated molds. As the steel travels through the molds, it is cooled and formed into a square cross-section ("billet") shape. As the steel exits the molds, it is further cooled in a water spray chamber.

Relatively small quantities of emissions result from the fuming of steel during its transfer from the ladle to the tundish and to the mold as well as the volatilization, pyrolysis, and combustion of mold oil. Most of these emissions exit the building uncaptured through the Caster Room roof vent (EPN CASTERVENT), with a smaller fraction exhausting through the spray chamber stack (EPN CASTSPRAY).

The tundish is preheated using a natural gas-fired heater. Combustion emissions are released during tundish preheating. In addition, the refractory lining of the tundish must be repaired and/or rebuilt occasionally. This may involve the use of organic binding agents, which may generate small quantities of CO, PM, and VOC emissions. In addition, low-level PM emissions may be generated from the removal of spent refractory. Emissions from the tundish preheating and tundish refractory repair/rebuilding exit the building uncaptured through the Caster Room roof vent.

Emission sources associated with Caster and associated processes will include the following:

- Caster operations (EUN CASTER and EPNs CASTERVENT and CASTSPRAY)
- Tundish preheating (EUN TUNDPHEAT and EPN CASTERVENT)
- Tundish refractory drying (EUNs TUNDDRYER and TUNDMANDRY and EPN CASTERVENT)
- Spent tundish refractory handling in the Caster Room (EUN REFRCCASTR and EPN CASTERVENT)
- Outdoor spent tundish refractory handling and storage (REFRCHNDLG and EPN SLAGYARD)
- Paved roads (EUN ROADS and EPN ROADS)
- Unpaved roads (EUN ROADS and EPN ROADS)

Rolling Operations

After casting, the steel billets are straightened and cooled gradually. An electric induction coil is used to generate a uniform billet temperature prior to rolling. After rolling and forming, the finished product is cooled in a cooling bed.

Finishing Process

The rolled steel is then cooled on a natural convection cooling bed, bundled and stored. To produce some structural material such as angles and channels, the rebar is unbundled and passed through a straightener roller process. The finished products are shipped off-site by truck as needed for use by customers.

Slag Handling and Crushing

Slag is formed as flux materials are added to the steel bath to remove impurities in both the EAF and LMS. The slag formed in the EAF tends to be larger in diameter and requires processing prior to resale as a usable aggregate product.

The molten slag formed in the EAF is emptied into concrete- and slag-lined pits beneath the furnace for cooling. The slag is subsequently removed from the pits using a front-end loader and transported to the slag processing area. In this area, the slag is initially air cooled.

The much smaller volume of slag formed in the LMS is emptied from the ladle after the LMS refining operation is complete. After cooling, the LMS slag is transported to the slag processing area.

In the processing area, slag is crushed and separated into various products. Processed slag products are transported off-site by truck for sale to customers for use as road-base materials and other uses that may require aggregate products.

Emission sources associated with the slag handling, sorting, and crushing processes will include the following:

- Slag handling in the Melt Room (EUN SLAGMELT and EPN MELTBH)
- Slag cooling (EUN SLAGCOOLING and EPN SLAGYARD)
- Outdoor slag handling, processing, and storage after quenching (EUN SLAGPROCSS and EPN SLAGYARD)
- Paved roads (EUN ROADS and EPN ROADS)
- Unpaved roads (EUN ROADS and EPN ROADS).

Cooling Towers

Cooling towers (EPNs COOLTOWER1, COOLTOWER2, and COOLTOWER3, respectively) are used to remove heat from the water used in various parts of the steelmaking process. A small amount of PM emissions may be generated from cooling tower drift losses.

Emergency Reciprocating Internal Combustion Engines

The site operates three emergency engines, two to provide emergency electrical power (EPNs ENG-GEN1 and ENG-GEN2, respectively) and one to provide water pumping (EPN ENG-FWP1). With respect to conducting required periodic readiness testing and maintenance on the engines, CMC will comply with the restriction specified in 40 CFR Part 60, Subpart IIII for annual hours of non-emergency operation for new emergency engines.

Diesel Fuel Storage Tanks

The facility includes four diesel storage tanks, three for the emergency engines and a fourth for vehicle fueling. VOC emissions are less than 0.01 TPY.

Quality Assurance

The Quality Assurance operations utilize laboratories for testing metallurgical properties of steel. Laboratory activities are "trivial activities."

SECTION III. EQUIPMENT

EUG 01 Melt Shop and EUG 02 Ladle Metallurgy Station

EU ID#	Point ID#	EU Name/Model	Construction Date
EAF	MELTBH	Electric Arc Furnace (EAF)	2016
LMS	MELTBH	Ladle Metallurgy Station	2016
ALLOYMELT	MELTBH	Alloy Handling in the Melt Room	2016
SLAGMELT	MELTBH	Slag Handling in the Melt Room	2016

EUG 03 Gas-Fired Heaters and EUG 04 Continuous Caster

EU ID#	Point ID#	EU Name/Model	Construction Date
LADLEDRYER	CASTERVENT	Ladle Dryers	2016
LADLEPHEAT	CASTERVENT	Ladle Preheaters	2016
TUNDDRYER	CASTERVENT	Tundish Dryer	2016
TUNDMANDRY	CASTERVENT	Tundish Mandril Dryer	2016
TUNDPHEAT	CASTERVENT	Tundish Preheaters	2016
CASTER	CASTERVENT	Continuous Caster	2016
REFRCCASTR	CASTERVENT	Spent Refractory Handling in the Caster Room	2016
CASTER	CASTSPRAY	Continuous Caster	2016

EUG 05 Materials Storage & Handling

EU ID#	Point ID#	EU Name/Model	Construction Date
CARBNHNDLG	CARBHOPPER	Carbon handling/storage system	2016
CARBNHNDLG	CARBSILO1	Carbon handling/storage system	2016
FLUXHNDLG	FLUXHOPPER	Fluxing agent handling/storage system	2016
FLUXHNDLG	FLUXSILO1	Fluxing agent handling/storage system	2016
FLUXHNDLG	FLUXSILO2	Fluxing agent handling/storage system	2016

EUG 06 Scrap Cutting

EU ID#	Point ID#	EU Name/Model	Construction Date
SCRAPCUT	SCRAPCUT	Torch cutting of scrap	2016

EUG 07 Outdoor Material Handling

EU ID#	Point ID#	EU Name/Model	Construction Date
ALLOYHNDLG	ALLOYPILES	Outdoor alloy handling/storage	2016
SLAGQCOOLING	SLAGYARD	Slag cooling/surge pile	2016
REFRCHNDLG	SLAGYARD	Outdoor spent refractory handling/storage	2016
SCALENHDLG	SCALEPILES	Outdoor mill scale handling/storage	2016
SWEEPHNDLG	SCRAPYARD	Outdoor residual scrap/sweepings handling	2016
SCRAPBLDG	SCRAPBLDG	Scrap handling at scrap storage building	2016
SCRAPHNDLG	SCRAPYARD	Outdoor scrap handling in yard	2016
SLAGPROCSS	SLAGYARD	Outdoor slag handling/storage/processing	2016
DUSTHNDLG	DUSTBLDG	EAF baghouse dust handling/storage system	2016

EUG 08 Baghouse Dust Handling

EU ID#	Point ID#	EU Name/Model	Construction Date
DUSTHNDLG	DUSTSILO1	EAF baghouse dust handling/storage system	2016

EUG 09 Emergency Generator

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-GEN1	ENG-GEN1	Emergency generator	2016

EUG 10 Emergency Generator

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-GEN2	ENG-GEN2	Emergency generator	2016

EUG 11 Firewater Pump Engine

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-FWP1	ENG-FWP1	Fire pump engine	2016

EUG 12 Roads

EU ID#	Point ID#	EU Name/Model	Construction Date
ROADS	ROADS	Plant roads	2016

There are no tanks contemplated for liquid raw material storage. The mold lubricant, etc., are in drums and portable totes.

EUG 13 Cooling Towers

EU ID#	Point ID#	EU Name/Model	Construction Date
COOLTOWER1	COOLTOWER1	Cooling Tower 1	2016
COOLTOWER2	COOLTOWER2	Cooling Tower 2	2016
COOLTOWER3	COOLTOWER3	Cooling Tower 2	2016

EUG 14 Diesel Tanks

EU ID#	Point ID#	EU Name/Model	Construction Date
DSLTK-GEN1	DSLTK-GEN1	500-gallon diesel tank	2016
DSLTK-GEN2	DSLTK-GEN2	500-gallon diesel tank	2016
DSLTK-FWP-1	DSLTK-FWP-1	500-gallon diesel tank	2016
DSKTK-VEH	DSKTK-VEH	10,000-gallon diesel tank	2016

SECTION IV. EMISSIONS

The applicant has requested that all emissions calculations be held confidential. The following emissions are from the PSD construction permit. If the facility conducts testing at production rates approaching maximum, emissions limits will be increased toward these levels.

SUMMARY OF EMISSIONS BY DISCHARGE POINT

Point ID	PM_{10}		$PM_{2.5}$		NOx		CO		VOC		SO_2		GHG	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
MELTBH	13.37	58.57	13.37	58.57	30.00	97.50	400.00	1,300.00	30.00	97.50	60.00	195.00	--	173,810
CASTERVENT	2.08	7.93	2.08	7.92	3.90	17.04	5.24	22.22	1.32	5.38	0.27	1.10	--	20,061
CASTSPRAY	0.26	1.06	0.26	1.06	0.02	0.07	0.39	1.59	0.26	1.05	0.06	0.25	--	18
SCRAPYARD	0.08	0.31	0.01	0.047	--	--	--	--	--	--	--	--	--	--
SCRAPBLDG	0.02	0.04	0.01	0.01	--	--	--	--	--	--	--	--	--	--
ALLOYPILES	0.01	0.01	0.01	0.01	--	--	--	--	--	--	--	--	--	--
SCALEPILES	0.02	0.02	0.01	0.01	--	--	--	--	--	--	--	--	--	--
DUSTBLDG	0.22	0.01	0.03	0.01	--	--	--	--	--	--	--	--	--	--
FLUXSILO1	0.26	1.13	0.26	1.13	--	--	--	--	--	--	--	--	--	--
FLUXSILO2	0.26	1.13	0.26	1.13	--	--	--	--	--	--	--	--	--	--
FLUXHOPPER	0.07	0.30	0.07	0.30	--	--	--	--	--	--	--	--	--	--
CARBSILO1	0.18	0.77	0.18	0.77	--	--	--	--	--	--	--	--	--	--
CARBHOPPER	0.14	0.60	0.14	0.60	--	--	--	--	--	--	--	--	--	--
DUSTSILO1	0.11	0.49	0.11	0.49	--	--	--	--	--	--	--	--	--	--
ROADS	0.73	0.64	0.11	0.12	--	--	--	--	--	--	--	--	--	--
COOLTOWER 1	0.08	0.36	0.08	0.36	--	--	--	--	--	--	--	--	--	--
COOLTOWER 2	0.11	0.48	0.11	0.48	--	--	--	--	--	--	--	--	--	--
COOLTOWER 3	0.11	0.48	0.11	0.48	--	--	--	--	--	--	--	--	--	--
SLAGYARD	0.22	0.45	0.03	0.07	--	--	--	--	--	--	--	--	--	--
ENG-GEN1	0.10	0.01	0.10	0.01	1.84	0.09	1.73	0.09	0.13	0.01	0.01	0.01	--	17
ENG-GEN2	0.53	0.03	0.53	0.03	15.77	0.79	9.21	0.46	1.05	0.05	0.02	0.01	--	92
ENG-FWP1	0.06	0.01	0.06	0.01	0.74	0.04	0.99	0.05	0.05	0.01	0.01	0.01	--	7
SCRAPCUT	0.20	0.20	0.20	0.20	0.06	0.12	0.03	0.06	0.01	0.01	0.01	0.01	--	--
DSLTK	--	--	--	--	--	--	--	--	--	0.20	--	--	--	--
TOTALS	**19.22**	**75.03**	**18.13**	**73.82**	**52.33**	**115.65**	**417.59**	**1,324.47**	**33.02**	**104.01**	**60.38**	**196.39**	**--**	**194,006**

Hazardous Air Pollutants

Since steel is cast without sand molds, HAP emissions are minimal. HAP emissions result from the melting and casting PM emissions, and formaldehyde from the combustion units. Metal HAP emissions have been estimated at 0.47 TPY lead. Gas-fired heaters formaldehyde emissions will be 0.013 TPY. These are less than the major source threshold of 10 TPY of any one HAP.

Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions were calculated using the factors of 40 CFR Part 98, Subpart C for stationary fuel combustion and Subpart Q for iron and steel production. Potential emissions are 194,006 TPY CO_2e.

SECTION V. INSIGNIFICANT ACTIVITIES

Insignificant activities are listed in OAC 252:100-8, Appendix I. Insignificant activities identified and justified in the application are listed below.

- Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas). The facility includes numerous gas-fired heaters which are smaller than 5 MMBTUH. However, since these units are subject to BACT, they will not be among the "insignificant activities."

- * Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. The facility includes four diesel storage tanks and small portable "totes" for casting lube oil storage.

- Hand wiping and spraying of solvents from containers with less than or equal to 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. Spot cleaning is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the Specific Conditions.

- * Activities having the potential to emit no more than 5 TPY (actual emissions) of any criteria pollutant. No additional activities listed but may be used in the future.

SECTION VI. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Applicable]

The facility is a PSD major stationary source for NOx, CO, SO_2, PM_{10}, and VOC. Any future increases must be evaluated in the context of PSD significant emission rates: 40 TPY NOx, 100 TPY CO, 40 TPY SO_2, 15 TPY PM_{10}, 10 TPY $PM_{2.5}$, 40 TPY VOC, 10 TPY TRS, 0.6 TPY lead, or 75,000 TPY GHG.

NSPS, 40 CFR Part 60 [Subparts AAa and IIII Applicable]

Subpart AAa, Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983, applies to Electric Arc Furnaces (EAF) in the Steel Industry which commences construction, modification, or reconstruction after August 17, 1983, and on or before May 16, 2022. Discharges from EAFs are limited to 0.0052 gr/DSCF and 3% opacity. (The PSD permit limits PM to 0.0024 gr/DSCF, therefore, is more stringent than Subpart AAa.) Shops containing affected facilities are limited to 6% opacity and dust-handling systems are limited to 10% opacity. A COMS is required on the baghouse unless the operator (1) conducts daily Method 9 VE readings, or (2) installs bag leak detectors.

Subpart AAb, Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarbonization Vessels Constructed After May 16, 2022, applies to the following affected facilities in steel plants that produce carbon, alloy, or specialty steels: electric arc furnaces (EAF), argon-oxygen decarburization (AOD) vessels, and dust-handling systems. This facility was commenced construction prior to May 16, 2022, and has not been modified or reconstructed.

Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The two emergency generators and one fire pump are subject to standards for emergency use engines. The emission limits for the engines are confidential but the limits for similar engines are listed below.

Engine Power	**NMHC+NOx g/hp-hr**	**CO g/hp-hr**	**PM g/hp-hr**
Emergency Engines (non-fire pump)			
≥50-hp <100-hp	5.6	3.7	0.30
≥50-hp <100-hp	3.5	3.7	0.30
≥100-hp <175-hp	3.0	3.7	0.22
≥175-hp <300-hp	3.0	3.7	0.15
≥300-hp <600-hp	3.0	2.6	0.15
Fire Pump Engines			
≥300-hp <600-hp	3.0	2.6	0.20

NESHAP, 40 CFR Part 61 [Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, coke oven emissions, radionuclides or vinyl chloride. The facility emits mercury and benzene but it is not one of the applicable sources and is, therefore, exempt from this part.

NESHAP,40 CFR Part 63 [Subparts ZZZZ and YYYYY Are Applicable]

Subpart XXX (Ferromanganese and Silicomanganese Alloys). This facility will not produce products with this composition.

Subpart ZZZZ (Reciprocating Internal Combustion Engines (RICE)). This subpart affects RICE located at area and major sources of HAP emissions. Owners and operators of new or reconstructed engines at area sources and of new or reconstructed engines with a site rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). The engines at this facility are

considered new engines located at an area source and are subject to Subpart IIII. There are no other requirements for these engines under this subpart.
Subpart EEEEE (Iron and Steel Foundries). This subpart was promulgated on April 22, 2004. Subpart EEEEE affects only foundry operations at major sources of HAPs; the CMC facility is not a foundry or major HAPs source, and is an "area" source.
Subpart YYYYY (Electric Arc Furnace Steelmaking Facilities: Area Sources). This subpart affects each EAF steelmaking facility. The operator is required to follow a pollution prevention plan to inspect scrap, removing chlorinated plastics, free organic materials, and lead; alternatively, the facility must not charge scrap from motor vehicle bodies, engine blocks, oil filters, oily turnings, machine shop borings, transformers or capacitors containing PCBs, lead-containing components, chlorinated plastics, or free organic liquids. Mercury switches must be removed from scrap before charging to the EAFs. Electric arc furnaces and argon-oxygen decarburation vessels are limited to 0.0052 gr/DSCF PM and 6% opacity. The BACT requirements are more stringent than these area source MACT standards.
Subpart JJJJJJ, Industrial, Commercial, and Institutional Boilers. This MACT only affects boilers not gas-fired heaters.

Compliance Assurance Monitoring, 40 CFR Part 64 [Applicable]
Compliance Assurance Monitoring, as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant.
- It uses a control device to achieve compliance with the applicable emission limit or standard.
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than major source thresholds.

Baghouse particulate control devices are used on the EAF and Continuous Caster. The baghouses on the EAF have potential pre-control device emissions exceeding the applicability threshold and is subject to this part, but have controlled emission limits less than the major source threshold and are not "large pollutant specific emission units". CAM plans are required at operating permit renewal. The potential uncontrolled emission from the caster operations does not exceed the applicability threshold.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
This facility does not store any regulated substance above the applicable threshold limits. More information on this federal program is available at the web site: *http://www.epa.gov/rmp/*. An analysis will be done after the design of the new furnaces is finalized to determine if the CMC facility will store any of the listed chemicals or substances at quantities near or above the threshold levels.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F);

require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).
Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.
Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The Standard Conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION VII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. The primary standards are enumerated in Appendix E and the secondary standards are enumerated in Appendix F of the Air Pollution Control Rules (OAC 252:100). National Ambient Air Quality Standards (NAAQS) are established by the U.S. EPA. The actual ambient air concentration of criteria pollutants are monitored within the State of Oklahoma by ODEQ's Air Quality Division. At this time, all of Oklahoma is in "attainment" of these standards. Also, the construction permit analysis indicated that the added emissions from the facility will not cause an exceedance of these standards.

OAC 252:100-5 (Registration, Emission Inventory, and Annual Fees) [Applicable]
The owner or operator of any facility that is a source of air emissions shall submit a complete emission inventory annually on forms obtained from the AQD.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 7 includes the requirements for PSD Requirements for Attainment Areas. The furnace project was considered a "Major Modification" since the net emissions increase of criteria pollutants exceeded the significance thresholds. Part 7 was applicable to CO, NO_X, SO_2, VOC, GHG, and PM_{10}

/ $PM_{2.5}$. As such, a BACT analysis (252:100-8-34), air quality impact analysis (252:100-8-35), and Class I area impact analysis (252:100-8-36) were required.
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant, or
- 2 TPY of any one HAP or 5 TPY of multiple HAP or 20 percent of any threshold less than 10 TPY for single HAP that the EPA may establish by rule.

This facility meets the definition of a major source since it has the potential to emit regulated pollutants in excess of 100 TPY. As such, a Title V operating permit is required. Emission limitations for all the sources are taken from the permit application and previous permit.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-19 (Particulate Matter) [Applicable]
This subchapter specifies maximum allowable emissions of particulate matter (PM) based on rated heat input. All fuel-burning units are in compliance with their applicable limits. The application requested that the capacities be kept confidential. The size and resultant PM emissions have been reviewed and concurred to comply with Subchapter 19.
This subchapter also specifies the allowable rates of emissions from industrial processes based on process rate. The application requested that the process rates be kept confidential. The process rates and resultant PM emissions have been reviewed and concurred to comply with Subchapter 19.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
No discharge of greater than 20 percent opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60 percent opacity. Units subject to an opacity standard under NSPS or NESHAP are exempt from this subchapter, including two EAFs and the LMF. The diesel fired engines subject to NSPS are not expected to exceed the opacity standards of this subchapter. The gas fired heaters also are not expected to exceed the opacity standards of this subchapter.

OAC 252:100-29 (Fugitive Dust) [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. The primary sources of fugitive dust are unpaved roads and slag processing. This permit also requires that reasonable precautions be taken to minimize fugitive dust.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. The permit requires the use of pipeline natural gas with sulfur content less than 4 ppmv to ensure compliance with Subchapter 31. For liquid fuels for the emergency generators, Part 5 limits SO_2 emissions to 0.8 lb/MMBTU. NSPS limits the engines to diesel fuel with 15 ppmw sulfur with SO_2 emissions of 0.00015 lb/MMBTU. This emission rate is in compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]
The rule affects NOx emissions from new fuel-burning equipment with a rated heat input of 50 MMBTUH or more. This facility has several fuel-burning units, but none exceeds the threshold: the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
This subchapter affects the following processes: foundry cupola, blast furnace, basic oxygen furnace, and catalytic cracking unit. The EAF furnace is not among the types of equipment regulated by Subchapter 35.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 requires new (constructed after December 28, 1974) storage tanks with a capacity between 400 and 40,000 gallons holding an organic liquid with a true vapor pressure greater than 1.5 psia to be operated with a submerged fill pipe. The diesel tanks and caster lube oil tank have vapor pressures below the 1.5 psia threshold.
Part 5 limits the VOC content of paints and coatings. There are no coating lines at this facility. The fencepost painting operation is at the adjacent CMC Posts plant which is permitted separately from the melting/casting operations.
Part 7 requires fuel-burning equipment to be cleaned, operated, and maintained so as to minimize VOC emissions. Based on manufacturer's data and good engineering practice, the equipment must not be overloaded and temperature and available air must be sufficient to provide essentially complete combustion. The permit will require compliance.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing

must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. In addition to the NSPS requirements for the EAF, Specific Conditions No. 11 and No. 12 require periodic testing of CO (PTE of 1,300 TPY) and SO_2 (PTE 190 TPY). All other emissions units have PTEs below 100 TPY.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-8 Part 9	Major Sources Affecting Nonattainment Areas	not in area category
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-29-2	Fugitive Dust/Nonattainment Areas	not in area category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

SECTION VIII. COMPLIANCE

Tier Classification & Public Review

This application has been determined to be **Tier II** based on the request for a Part 70 operating permit. Part 70 operating permit fee of $7,500 has been received.

The applicant published the "Notice of Filing a Tier II Application" in the *Durant Record* on December 15, 2023, a daily newspaper of general circulation in Bryan County. The notice said that the application was available for public review at the Durant Public Library or at the AQD office in Oklahoma City. A draft of this permit will also be made available for public review for a period of thirty days as stated in another published announcement. The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at http://www.deq.ok.gov.

The draft permit will also be available for public review on the Air Quality section of the DEQ web page at *http*:/www.deq.ok.gov. The proposed permit will be sent to EPA for a 45-day review period.

This facility is located within 50 miles of the border of Oklahoma and Texas. That state will be notified of the draft permit. Tribal Nations will be notified of the draft permit.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8(j) may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition

shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8(j), the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8(j), the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

Stack Testing

Stack testing was conducted on the new EAF and LMF on October 25-31, 2016. Results of the testing are listed following. The new units are in compliance with applicable emissions limitations.

Emission Unit	Electric Arc Furnace Baghouse MELTBH	
	Emissions Limitation	**Test Results**
NOx	30 lb/hr	9.5 lb/hr
CO	400 lb/hr	105.0 lb/hr
VOC	30 lb/hr	11.9 lb/hr
SO_2	60.00 lb/hr	24.1_ lb/hr
PM	13.37 lb/hr	6.06 lb/hr
	0.0024 gr/dscf	0.0023 gr/dscf

Environmental Justice Review

Environmental justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Meaningful involvement means:

- People have an opportunity to participate in decisions about activities that may affect their environment and/or health;
- The public's contribution can influence the regulatory agency's decision;
- Community concerns will be considered in the decision making process; and
- Decision makers will seek out and facilitate the involvement of those potentially affected.

EPA has prepared a screening tool, EJSCREEN, to assist permitting authorities in determining when a permit action may disproportionally impact a community. EJSCREEN incorporates census data to

show the demographics adjacent to a facility. Twelve criteria have been identified to determine whether a disproportionate impact is occurring on nearby minority populations. If those impacts exceed the 80% percentile, additional public participation is warranted.

The indexes in the EJ Screening tool to be considered are the following:

- Particulate Matter 2.5
- Ozone
- Diesel Particulate Matter
- Air Toxic Cancer Risk
- Air Toxic Respiratory Hazard Index
- Traffic Proximity
- Lead Paint, this addresses lead paint based on number of homes built <1960
- Superfund proximity
- Risk management plan (RMP) facility proximity
- Hazardous waste proximity
- Underground storage tanks (UST) and leaking UST (LUST)
- People of Color

The following table shows the EJSCREEN finding for a 1.5 mile buffer surrounding the location of the plant.

Criterion	**Screening Level of Concern**	**State Percentile**	**USA Percentile**
$PM_{2.5}$	80th Percentile	27	62
Ozone	80th Percentile	79	68
Diesel Particulate Matter	80th Percentile	38	22
Air Toxic Cancer Risk	80th Percentile	29	28
Air Toxic Respiratory Hazard Index	80th Percentile	11	31
Traffic Proximity	80th Percentile	36	24
Lead Paint	80th Percentile	48	40
Superfund Proximity	80th Percentile	1	2
Risk Management Plan Facility Proximity	80th Percentile	89	87
Hazardous Waste Proximity	80th Percentile	76	48
Underground storage tanks (UST) and leaking UST (LUST)	80th Percentile	46	43
Wastewater Discharge	80th Percentile	78	63
People of Color	80th Percentile	35	39

All criteria are below the screening levels of concern except for proximity to a facility which required a Risk Management Plan. This facility itself is not subject to the requirements of a Risk Management Plan Analysis, (FRP). Enhanced public review will be needed. Special public comment notices will be developed by DEQ and placed in the direct community. These notices will provide additional outreach to inform the community of the draft permit action and provide guidance on how to review the application and draft permit and how to provide comments.

SECTION IX. SUMMARY

The facility was constructed as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility. Issuance of the operating permit is recommended, contingent on public, EPA, and tribal review.

DRAFT

PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Commercial Metals Company **Permit No. 2015-0643-TV**
Durant Steel Mill

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on June 28, 2018. The Evaluation Memorandum, dated February 5, 2025, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Point of emissions and applicable emissions limitations. [OAC 252:100-8-6(a)(1)]

A. EUG 01 Melt Shop and EUG 02 Ladle Metallurgy Station

EU ID#	Point ID#	EU Name/Model	Construction Date
EAF	MELTBH	Electric Arc Furnace (EAF)	2016
LMS	MELTBH	Ladle Metallurgy Station	2016
ALLOYMELT	MELTBH	Alloy Handling in the Melt Room	2016
SLAGMELT	MELTBH	Slag Handling in the Melt Room	2016

Point ID	$PM/PM_{10}/PM_{2.5}$		SO_2		NOx		VOC		CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
MELTBH	13.37	58.57	60.00	195.00	30.00	97.50	30,00	97.50	400.00	1,300.0

Point ID	Lead	
	lb/hr	TPY
MELTBH	0.11	0.47

1. Discharges from these units shall be processed by a fabric filter or equivalent system which achieves 0.0024 gr/DSCF PM emissions (filterable plus condensable PM).
2. The electric arc furnace and dust handling systems are subject to 40 CFR Part 60, Subpart AAa, and shall comply with all applicable provisions. Applicability and designation of affected facility.

   [40 CFR §60.270a]

   a. Definitions [40 CFR §60.271a]

   b. Standard for particulate matter [40 CFR §60.272a]

   c. Emissions monitoring [40 CFR §60.273a]

   (c)(2) Visible emission observations shall be conducted of the control device at least once per day for at least three 6-minute periods when the furnace is operating in the melting and refining period. All visible emissions observations shall be conducted in accordance with EPA Method 9 of appendix A to this part, or, as an alternative, according to ASTM D7520–16 (incorporated by reference, see § 60.17), with the caveats described under *Shop opacity* in § 60.271.

   d. Monitoring of operations [40 CFR §60.274a]

   e. Test methods and procedures [40 CFR §60.275a]

   f. Recordkeeping and reporting requirements [40 CFR §60.276a]

3. The following energy-efficient practices and designs shall be incorporated into the facility:
   a. Scrap preheating
   b. Use of continuous billet rolling

4. The following emissions levels shall be met by the EAF, in terms of lb/ton of steel melted.
   a. 0.3 lb/ton NOx
   b. 0.6 lb/ton SO_2.
   c. 0.3 lb/ton VOC.
   d. 4.0 lb/ton CO.
   e. 535 lb/ton CO_2e.

5. Compliance with the hourly and BACT limits shall be demonstrated by stack testing as described in Specific Condition No. 9. Compliance with the annual emission limits shall be demonstrated by records of annual steel casting below the limit in Specific Condition No. 2. [OAC 252:100-43]

B. EUG 03 Gas-fired Heaters and EUG-04 Continuous Caster

EU ID#	Point ID#	EU Name/Model	Construction Date
LADLEDRYER	CASTERVENT	Ladle Dryer	2016
LADLEPHEAT	CASTERVENT	Ladle Preheaters	2016
TUNDDRYER	CASTERVENT	Tundish Dryer	2016
TUNDMANDRY	CASTERVENT	Tundish Mandril Dryer	2016
TUNDPHEAT	CASTERVENT	Tundish Preheaters	2016
CASTER	CASTERVENT	Continuous Caster	2016
CASTER	CASTSPRAY	Continuous Caster	2016

Point ID	PM_{10} / $PM_{2.5}$		SO_2		NOx		VOC		CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
CASTER VENT	2.08	7.93	0.27	1.10	3.90	17.04	1.32	5.38	5.24	22.22
CASTER SPRAY	0.26	1.06	0.06	0.25	0.02	0.07	0.26	1.05	0.39	1.59

1. The above heaters shall be fueled with pipeline-grade natural gas.

C. EUG 05 Melt Shop Materials Storage

EU ID#	Point ID#	EU Name/Model	Construction Date
CARBNHNDLG	CARBHOPPER	Carbon handling/storage system	2016
CARBNHNDLG	CARBSILO1	Carbon handling/storage system	2016
FLUXHNDLG	FLUXHOPPER	Fluxing agent handling/storage system	2016
FLUXHNDLG	FLUXSILO1	Fluxing agent handling/storage system	2016
FLUXHNDLG	FLUXSILO2	Fluxing agent handling/storage system	2016
REFRCCASTR	CASTERVENT	Spent refractory handling in the Caster Room	2016

EU ID#	Point ID#	EU Name/Model	PM_{10} / $PM_{2.5}$	
			lb/hr	TPY
CARBNHNDLG	CARBHOPPER	Carbon handling/storage system	0.14	0.60
CARBNHNDLG	CARBSILO1	Carbon handling/storage system	0.18	0.70
FLUXHNDLG	FLUXHOPPER	Fluxing agent handling/storage system	0.07	0.30
FLUXHNDLG	FLUXSILO1	Fluxing agent handling/storage system	0.26	1.13
FLUXHNDLG	FLUXSILO2	Fluxing agent handling/storage system	0.26	1.13

1. Discharges from these units shall be processed by a fabric filter or equivalent system which achieves 0.01 gr/DSCF PM emissions.
2. At least once in any calendar quarter in which material is loaded into a silo, the permittee shall conduct Method 22 testing of visible emissions from that silo during filling. The duration of the test shall be at least 15 minutes.

D. EUG 06 Scrap Cutting

EU ID#	Point ID#	EU Name/Model	Construction Date
SCRAPCUT	SCRAPCUT	Torch cutting of Scrap	2016

Point ID	PM /PM_{10}/ $PM_{2.5}$		SO_2		NOx		VOC		CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
SCRAPCUT	0.20	0.20	0.01	0.01	0.06	0.12	0.01	0.01	0.03	0.06

1. Scrap cutting shall be conducted using natural gas or LPG fuel and oxy-fired torches. [OAC 252:100-8-5]

E. EUG 07 Outdoor Material Handling

EU ID#	Point ID#	EU Name/Model	Construction Date	BACT
ALLOYHNDLG	ALLOYPILES	Outdoor alloy handling/storage	2016	Minimize Drop Height
SLAGCOOLING	SLAGYARD	Slag cooling station / surge pile	2016	Minimize Drop Height
REFRCHNDLG	SLAGYARD	Outdoor spent refractory handling/storage	2016	Minimize Drop Height & Wetting Material
SCALENHDLG	SCALEPILES	Outdoor mill scale handling/storage	2016	Minimize Drop Height & Wetting Material
SWEEPHNDLG	SCRAPYARD	Outdoor residual scrap/sweepings handling	2016	Minimize Drop Height
SCRAPBLDG	SCRAPBLDG	Scrap handling at Scrap Storage Building	2016	Partial Enclosure
SCRAPHNDLG	SCRAPYARD	Outdoor scrap handling in yard	2016	Minimize Drop Height
SLAGPROCSS	SLAGYARD	Outdoor slag handling/storage/processing	2016	Minimize Drop Height & Wetting Material
DUSTHNDLG	DUSTBLDG	EAF baghouse dust handling/storage system	2016	Partial Enclosure & Bag House

1. Reasonable precautions shall be taken to minimize fugitive dust emissions. These precautions shall include those listed in the BACT Column of Table G.

[OAC 252:100-29]

F. EUG 08 Baghouse Dust Handling

EU ID#	Point ID#	EU Name/Model	Construction Date
DUSTHNDLG	DUSTSILO1	EAF baghouse dust handling/storage system	2016

EU ID#	Point ID#	EU Name/Model	PM_{10} / $PM_{2.5}$	
			lb/hr	TPY
DUSTHNDLG	DUSTSILO1	EAF baghouse dust handling/storage system	0.11	0.49

1. Discharges from these units shall be processed by a fabric filter or equivalent system which achieves 0.01 gr/DSCF PM emissions.
2. At least once in any calendar quarter in which material is loaded into a silo, the permittee shall conduct Method 22 testing of visible emissions from that silo during filling. The duration of the test shall be at least 15 minutes.

G. EUG 09 Emergency Generator, EUG 10 Emergency Generator, and EUG 11 Firewater Pump Engine

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-GEN1	ENG-GEN1	Emergency Generator	2016

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-GEN2	ENG-GEN2	Emergency Generator	2016

EU ID#	Point ID#	EU Name/Model	Construction Date
ENG-FWP1	ENG-FWP1	Fire Pump	2016

1. The above engines are subject to 40 CFR Part 60, Subpart IIII, and shall comply with all applicable requirements including but not limited to: [40 CFR §§60.4200 – 4219]

   a. §60.4200: Am I subject to this subpart?
   b. §60.4201: What emissions standards must I meet for non-emergency engines if I am a stationary CI engine manufacturer?
   c. §60.4202: What emissions standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacture?
   d. §60.4203: How long must my engines meet the emissions standards if I am a stationary CI internal combustion engine manufacturer?
   e. §60.4204: What emissions standards must I meet for non-emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
   f. §60.4205: What emissions standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
   g. §60.4206: How long must my engines meet the emissions standards if I am a owner or operator of a stationary CI internal combustion engine?
   h. §60.4207: What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?
   i. §60.4208: What is the deadline for importing or installing stationary CI ICE produced in the previous model year?
   j. §60.4209: What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?
   k. §60.4210: What are my compliance requirements if I am a stationary CI internal combustion engine manufacturer?
   l. §60.4211: What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

m. §60.4212: What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?
n. §60.4213: What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of greater than or equal to 30 liters per cylinder?
o. §60.4214: What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?
p. §60.4215: What requirements must I meet for engines used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands?
q. §60.4216: What requirements must I meet for engines used in Alaska?
r. §60.4217: What emission standards must I meet if I am an owner or operator of a stationary internal combustion engine using special fuels?
s. §60.4218: What parts of the General Provisions apply to me?
t. §60.4219: What definitions apply to this subpart?

2. The owner/operator shall comply with all applicable requirements of the NESHAP Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility including but not limited to: [40 CFR §§63.6580 through 63.6675]

a. § 63.6580 What is the purpose of subpart ZZZZ?
b. § 63.6585 Am I subject to this subpart?
c. § 63.6590 What parts of my plant does this subpart cover?
d. § 63.6595 When do I have to comply with this subpart?
e. § 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
f. § 63.6601 What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?
g. § 63.6602 What emission limitations and other requirements must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?
h. § 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
i. § 63.6604 What fuel requirements must I meet if I own or operate a stationary CI RICE?
j. § 63.6605 What are my general requirements for complying with this subpart?
k. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?
l. § 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

m. § 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
n. § 63.6615 When must I conduct subsequent performance tests?
o. § 63.6620 What performance tests and other procedures must I use?
p. § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
q. § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
r. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
s. § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
t. § 63.6645 What notifications must I submit and when?
u. § 63.6650 What reports must I submit and when?
v. § 63.6655 What records must I keep?
w. § 63.6660 In what form and how long must I keep my records?
x. § 63.6665 What parts of the General Provisions apply to me?
y. § 63.6670 Who implements and enforces this subpart?
z. § 63.6675 What definitions apply to this subpart?

3. The engines shall be operated a maximum of 100 hours per calendar year for maintenance and reliability checks, and other non-emergency operations. Records of hours of operation shall be kept for each engine. [OAC 252:100-43]

H. EUG 12 Roads

EU ID#	Point ID#	EU Name/Model	Construction Date
ROADS	ROADS	Plant Roads	2016

1. The following measures shall be implemented to minimize fugitive dust emissions from plant roads: [OAC 252:100-29]

a. Paved haul roads shall be cleaned as necessary.
b. Speed limits shall be set and enforced on plant roads.

I. EUG 13 Cooling Towers

EU ID#	Point ID#	EU Name/Model	Construction Date
COOLTOWER1	COOLTOWER1	Cooling Tower 1	2016
COOLTOWER2	COOLTOWER2	Cooling Tower 2	2016
COOLTOWER3	COOLTOWER3	Cooling Tower 2	2016

EU ID#	Point ID#	EU Name/Model	PM_{10} / $PM_{2.5}$	
			lb/hr	TPY
COOLTOWER1	COOLTOWER1	Cooling Tower 1	0.08	0.36
COOLTOWER2	COOLTOWER2	Cooling Tower 2	0.11	0.48
COOLTOWER3	COOLTOWER3	Cooling Tower 2	0.11	0.48

1. The above units shall be operated with drift eliminators designed to achieve 0.001% or better.

J. EUG 14 Diesel Tanks

EU ID#	Point ID#	EU Name/Model	Construction Date
DSLTK-GEN1	DSLTK-GEN1	500-gallon diesel tank	2016
DSLTK-GEN2	DSLTK-GEN2	500-gallon diesel tank	2016
DSLTK-FWP-1	DSLTK-FWP-1	500-gallon diesel tank	2016
DSKTK-VEH	DSKTK-VEH	10,000-gallon diesel tank	2016

2. The permittee shall be authorized to operate the electric arc furnaces continuously (24 hours per day, every day of the year) up to a production rate of 650,000 tons/yr of cast steel produced, 12-month rolling total. [OAC 252:100-8-6(a)]

3. Except for units subject to opacity limitations of 40 CFR Part 60, Subpart AAa or 40 CFR Part 63, Subpart YYYYY, the opacity of any emission to the atmosphere shall not exceed 20% except for short-term occurrences not to exceed six minutes in any hour or three six-minute periods in any 24-hour period; in no case shall a six-minute opacity exceed 60%.
[OAC 252:100-25]

4. Except for the emergency engines, the fuel-burning equipment shall be fired with pipeline grade natural gas or other gaseous fuel with a sulfur content less than 4 ppmv. Compliance can be shown by the following methods: for pipeline grade natural gas, a current gas company bill; for other gaseous fuel, a current lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once every calendar year.
[OAC 252:100-31]

5. Pursuant to OAC 252:100-29, the permittee shall not cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.
[OAC 252:100-29]

6. Total facility greenhouse gas (CO_2e) shall not exceed 194,006 TPY, 12-month rolling total. Compliance with this limit shall be demonstrated using the methods of 40 CFR Part 98:
[40 CFR Part 98]

   A. Subpart Q shall be used for calculating EAF greenhouse gas emissions.
      1. §98.170: Definition of the source category
      2. §98.173: Calculating GHG emissions.
      3. §98.174: Monitoring and QA/QC requirements

4. §98.175: Procedures for estimating missing data
5. §98.177: Records that must be retained
6. §98.178: Definitions

B. Subpart C shall be used for calculating fuel combustion greenhouse gas emissions.
1. §98.30: Definition of the source category
2. §98.33: Calculating GHG emissions.
3. §98.34: Monitoring and QA/QC requirements
4. §98.35: Procedures for estimating missing data
5. §98.37: Records that must be retained
6. §98.38: Definitions
7. Appendix: Table C-1 to Subpart C of Part 98: Default CO_2 Emissions Factors and High Heat Values for Various Types of Fuel
8. Appendix: Table C-1 to Subpart C of Part 98: Default CH_4 and N_2O Emissions Factors and High Heat Values for Various Types of Fuel

7. Binder usage shall not exceed 12.03 TPY, 12-month rolling total. Casting lube oil usage shall not exceed 52.66 TPY, 12-month rolling total.

8. The following records of operations shall be maintained on site. All such records shall be made available to regulatory personnel upon request. These records shall be maintained for a period of at least five years after the time they are made.

A. Amount of cast steel produced (monthly and 12-month rolling totals).
B. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 4.
C. Records as required by 40 CFR Part 63, Subpart YYYYY.
D. Records as required by 40 CFR Part 60, Subpart AAa.
E. Records as required by 40 CFR Part 63, Subpart ZZZZ.
F. Records as required by 40 CFR Part 60, Subpart IIII.
G. Binder usage (monthly and 12-month rolling totals).
H. GHG emissions (monthly and 12-month rolling totals)
I. Caster lube oil usage (monthly and 12-month rolling totals).
J. Visible emissions testing of raw materials and baghouse dust silos (quarterly when operated).
K. Records of fire pump and emergency generator hours of operation (monthly and 12-month rolling totals).

9. Within 24-months of issuance of this permit, the permittee shall conduct performance testing as follows and furnish a written report to Air Quality. If the test results demonstrate emissions are below 80% of the permit limit, subsequent testing shall be performed once every 5 calendar years. If this initial test or any subsequent test results in emissions above 80% of the permit limits, testing shall be conducted once every calendar year until testing demonstrates emissions below 80% of the permit limit. Testing will then revert to every 5 calendar years.Testing shall be conducted while the EAF is being operated at representative conditions. A sampling protocol and notification of testing date(s) shall be submitted at least 30 days in advance of commencement of testing. The following USEPA methods shall be used for testing of emissions, unless otherwise approved by Air Quality: [OAC 252:100-43]

Method 1:	Sample and Velocity Traverses for Stationary Sources.
Method 2:	Determination of Stack Gas Velocity and Volumetric Flow Rate.
Method 3:	Gas Analysis for Carbon Dioxide, Excess Air, and Dry Molecular Weight.
Method 4:	Moisture in Stack Gases.
Method 10:	CO Emissions from Stationary Sources

10. Within 24-months of issuance of this permit, the permittee shall conduct performance testing as follows and furnish a written report to Air Quality. If the test results demonstrate emissions are below 80% of the permit limit, subsequent testing shall be performed once every 5 calendar years. If this initial test or any subsequent test results in emissions above 80% of the permit limits, testing shall be conducted once every calendar year until testing demonstrates emissions below 80% of the permit limit. Testing will then revert to every 5 calendar years.Testing shall be conducted while the EAF is being operated at representative conditions. A sampling protocol and notification of testing date(s) shall be submitted at least 30 days in advance of commencement of testing. The following USEPA methods shall be used for testing of emissions, unless otherwise approved by Air Quality: [OAC 252:100-43]

Method 1:	Sample and Velocity Traverses for Stationary Sources.
Method 2:	Determination of Stack Gas Velocity and Volumetric Flow Rate.
Method 3:	Gas Analysis for Carbon Dioxide, Excess Air, and Dry Molecular Weight.
Method 4:	Moisture in Stack Gases.
Method 6C:	SO_2 Emissions from Stationary Sources

11. The facility is subject to 40 CFR Part 63, Subpart YYYYY, and shall comply with all requirements specified in the final standard. [40 CFR Part 63, Subpart YYYYY]

Applicability and Compliance Dates
- A. § 63.10680 Am I subject to this subpart?
- B. § 63.10681 What are my compliance dates?

Standards and Compliance Requirements
- C. § 63.10685 What are the requirements for the control of contaminants from scrap?
- D. § 63.10686 What are the requirements for electric arc furnaces and argon-oxygen decarburization vessels?

Other Information and Requirements
- E. § 63.10690 What parts of the General Provisions apply to this subpart?
- F. § 63.10691 Who implements and enforces this subpart?
- G. § 63.10692 What definitions apply to this subpart?

12. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]

PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 NORTH ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2015-0643-TV

Commercial Metals Company,

having complied with the requirements of the law, is hereby granted permission to operate a steel mill at the intersection of Old US-70 and McLean Road, Sec. 34 – 6S – 9E, Durant, Bryan County, subject to standard conditions dated June 21, 2016, and specific conditions, both attached.

This permit shall expire five (5) years from the issuance date, except as authorized under Section VIII of the Standard Conditions.

Division Director **Date**

Air Quality Division

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Commercial Metals Company
Attn: Mr. Mike Raile
1 Steel Mill Drive
Seguin, TX 78155

Re: Permit Application No. 2015-0643-TV
Greenfield Steel Mill (FAC ID 14935)
Durant, Bryan County, Oklahoma

Dear Mr. Raile:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emission inventory for this facility. An emission inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emission Inventory Staff at (405) 702-4100.

Thank you for your cooperation in this matter. If we may be of further service, please contact our office at (405) 702-4100.

Sincerely,

DRAFT

Phillip Fielder, P.E.
AIR QUALITY DIVISION
Enclosure

Enclosure

MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.

[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM_{10}). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.
[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit. [OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment. [OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition. [OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.

(3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
(4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.
[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.
[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.
[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.

[OAC 252:100-13]

(2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]

(a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
(b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
(c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
(d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and

(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).

(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).
(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
(6) The DEQ complies with 40 C.F.R. § 70.8(d).
(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
11-20-24

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
AVO	Audio, Visual, or Olfactory
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
BBL	Barrel(s)
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CCR	Continuous Catalyst Regeneration
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COA	Capable of Accommodating
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DG	Demand Growth
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FCCU	Fluid Catalytic Cracking Unit
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
H_2CO	Formaldehyde
H_2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HFR	Horizontal Fixed Roof
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
ICE	Internal Combustion Engine
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
LPE	Legally and Practicably Enforceable
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NMHC	Non-methane Hydrocarbon
NGL	Natural Gas Liquids
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review

O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst
OGI	Optical Gas Imaging
PAH	Polycyclic Aromatic Hydrocarbons
PAE	Projected Actual Emissions
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per- and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement
RFG	Refinery Fuel Gas
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
SRU	Sulfur Recovery Unit
T	Tons
TAC	Toxic Air Contaminant
TEG	Triethylene Glycol
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VFR	Vertical Fixed Roof
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

February 5, 2025

Texas Commission on Environmental Quality
Operating Permits Division (MC 163)
P.O. Box 13087
Austin, TX 78711-3087

Re: Permit Application No. 2015-0643-TV
CMC Steel Oklahoma (FAC ID 14935)
Durant, Bryan County, Oklahoma
Permit Writer: David Schutz

Dear Sir / Madame:

The subject facility has applied for a Part 70 operating permit. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the **Oklahoma - Texas** border, a copy of the proposed permit will be provided to you upon request. The draft permit is also available for review on the Air Quality section of the DEQ web page at *http://www.deq.ok.gov*.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4198.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

Commercial Metals Company
Attn: Mike Raile
2353 E. Main Street
Durant, OK 74701

Permit Number: **2015-0643-TV**
Permit Writer: David Schutz
Date: February 5, 2025

SUBJECT: Permit Application No. 2015-0643-C (M-1)
CMC Steel Oklahoma (FAC ID 14935)
Durant, Bryan County, Oklahoma

Dear Mr. Raile:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
   Version 1 – Traditional NSR process for a construction permit
   Version 2 – Enhanced NSR process for a construction permit
   Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

Version 3 – For initial Title V operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating requirements of a construction permit that followed Traditional NSR process

DEQ NOTICE OF TIER *…II or III…* **DRAFT PERMIT**

A Tier *…II or III…* **application for an air quality** *…type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)…* **has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant,** *…name and address.*

The applicant requests approval to *…brief description of purpose of application…* **at the** *…site/facility name … …***[proposed to be] located at** *…physical address (if any), driving directions, and legal description including county….***.**

In response to the application, DEQ has prepared a draft operating permit [modification] (Permit Number: *….xxxx-xxxx-x…***), which may be reviewed at** *…locations (one must be in the county where the site/facility is located)…* **or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: http://www.deq.ok.gov/**

This draft permit would authorize the facility to emit the following regulated pollutants: *(list each pollutant and amounts in tons per year (TPY))* [For facility modifications only, either add**: , which represents** (*identify the emissions change involved in the modification)*, or add: **. The modification will not result in a change in emissions**]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. [Modifications only, add: **Only those issues relevant to the proposed modification(s) are open for comment.**] **A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.**

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: http://www.deq.ok.gov/.

For additional information, contact *…names, addresses and telephone numbers of contact persons for the applicant,* **or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

February 5, 2025

Chickasaw Nation
Attn: Bill Anoatubby, Governor
P.O. Box 1548
Ada, OK 74821

Re: Permit Application No. 2015-0643-C (M-1)
CMC Steel Oklahoma (FAC ID 14935)
Durant, Bryan County, Oklahoma
Date Received: April 15, 2022

Dear Mr. Anoatubby:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II application referenced above. The Tier II application requires the facility provide a 30-day public comment period on the draft Tier I on the Air Quality Division's web page. permit. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the web page notice.

Copies of draft permits and comment opportunities are located on the ODEQ website at the following location:

https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Robert Singletary
Executive Director

OKLAHOMA Environmental Quality

Kevin Stitt
Governor

February 5, 2025

Choctaw Nation of Oklahoma
Attn: Gary Batton, Chief
P.O. Box 1548
Ada, OK 74821

Re: Permit Application No. 2015-0643-C (M-1)
CMC Steel Oklahoma (FAC ID 14935)
Durant, Bryan County, Oklahoma
Date Received: April 15, 2022

Dear Mr. Batton:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II application referenced above. The Tier I application requires the facility provide a 30-day public comment period on the draft Tier II on the Air Quality Division's web page. permit. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the web page notice.

Copies of draft permits and comment opportunities are located on the ODEQ website at the following location:

https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION