Worksheet for Technical Review of Working Draft of Proposed Permit
All Title V Comments

Company Name:	**Consolidated Environmental Management**	**AI #:**	**157847**	**TEMPO Activity No:**	**PER20080002**
Facility Name:	**Nucor Steel Louisiana**	**Remarks Submitted by:**	**Environmental Resources Management**		
Permit Writer:	**Kermit Wittenburg**	**Permit Writer Email address:**	**Kermit.wittenburg@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
	Title V Permit – Specific Conditions:	
Global Comment: Requirements for LAC 33:III.1311.B	The requirement states: "Total suspended particulate <= XXXX lb/hr. The rate of emission shall be the tatal of all emission points from the source." These requirements intend to make explicit the process weight rate limitations on particulate matter emissions of Chapter 13. To avoid confusion or misinterpretation of estimated emission rates during public review and comment, the following language is suggested: "Total suspended particulate emissions shall not exceed XXXX lb/hr based on the process weight rate determination of LAC 33:III.1311.B. The rate of emission shall be the total of all emission points from the source."	**The requirement was reworded per the following example:** **Total suspended particulate <= 52.26 lb/hr. The rate of emission is a limitation based upon the product or process weight throughput and shall be the total of all emission points from the source. [LAC 33:III.1311.B]**
EQT0001 – COK-101: Requirement #31 **EQT007 – COK-201 Requirement #117** **LAC 33:III.509**	Requirement states: Coal compacting building Particulate matter (10 microns or less) >= 99.5% removal efficiency from filter manufacturer's certification. Determined as BACT. This requirement is not relevant to the charging operation identified by emission point COK-101. The requirement implies that a baghouse will be used during charging operations, which is not correct. The requirement should more properly be applied to emission point COK-100. Requirements #7 and #17 may already cover the intent of this requirement for emission point COK-100.	**Corrected**
RLP0006 – COK-111 Requirement # 222 **RLP0012 – COK-211 Requirement # 249, LAC 33:III.1513.A.1**	Requirement states: "Sulfur dioxide recordkeeping by continuous emission monitor (CEM) continuously" The requirement does not specify a data collection frequency or averaging period. A typical frequency is once every 15 minutes.	**Added corresponding monitoring requirement which specifies frequency.**

RLP0006 – COK-111 Requirement # 237 **RLP0012 – COK-211 Requirement # 260** **LAC 33:III.509**	Requirement states: "Sulfur dioxide >= 90% capture efficiency when the 6 month rolling average concentration of sulfur is less than or equal to 1%. Sulfur dioxide >= 91% capture efficiency when the 6 month rolling average concentration of sulfur is greater than 1%. Determined as BACT." There is no object identified for the 6 month rolling average sulfur content. Suggested language: "Sulfur dioxide >= 90% capture efficiency when the 6 month rolling average concentration of sulfur in the blended charge material is less than or equal to 1%. Sulfur dioxide >= 91% capture efficiency when the 6 month rolling average concentration of sulfur in the blended charge material is greater than 1%. Determined as BACT."	**Done**
RLP0006 – COK-111 Requirement # 238 **RLP0012 – COK-211 Requirement # 259** **LAC 33:III.509**	Requirement states: "Planned operation of the Coke Battery X FGD Bypass Bent shall be limited to a maximum of 8 days within a twelve month rolling period." The requirement implies that a separate bypass vent exists which exhausts to the atmosphere during FGD bypass events, which is not the case; bypass events are internal and only of the spray tower undergoing maintenance. Other control equipment is not bypassed. Suggested language: "Planned maintenance bypass of a tower within the Coke Battery X FGD system shall be limited to a maximum of 8 days within a twelve month rolling period. Flue gas bypassing an FGD tower must be diverted to the baghouse and may not be vented directly to the atmosphere."	**Done**

PCS0002 – Coke Battery Process Area Requirement #272 **40 CFR 63.303(d)(4)**	Requirement states: "Develop and implement written procedures for adjusting the oven uptake damper to maximize oven draft during charging and for monitoring the oven damper setting during each charge to ensure that the damper is fully open. Subpart L." This requirement is redundant with requirements #25 and #111 for COK-101 and -201 respectively.	**The requirements were removed from COK-101 & 201**
PCS0002 - Coke Battery Process Area Requirement #288 **LAC 33:III.507.H.1.a**	Requirement states: "Collect composite samples of blended charge material at least twice per day to be used for analysis of sulfur content." The frequency of this requirement is not what has been understood up to this time, and is not consistent with the coke sampling frequency of requirement #289. The sulfur content analysis requirement understood by Nucor to date sampling averaged weekly with FGD conditions triggered by the 6-month rolling average of the weekly sampling data. Because charge materials will be received in bulk and will not vary significantly over short time periods, this requirement should be consistent with the twice per week sampling of coke in requirement #289.	**Done**
PCS0002 - Coke Battery Process Area Requirement #296 **LAC 33:III.509**	Requirement states: "Sulfur <= 1.0% by weight average concentration in the blended charge material. Determined as BACT." This requirement is not what has been understood up to this time. Also, this requirement does not match the BACT Determination found in Specific Condition #2 of the PSD permit PSD-LA-740, which is a limit of maximum sulfur content on a weekly basis only (1.25% absolute). The 1.0% six-month rolling average sulfur content is not a limitation, but rather a trigger for more stringent control requirements at the FGD system. Emissions estimates are based on a 1.0% annual average sulfur content, not a six-month	**The calculation for annual sulfur dioxide emissions is based upon an annual average of 1%. The intent was to ensure that the annual emissions were below the limitation. Since a CEMs requirement was added to the FGD vents, this requirement is no longer needed.**

	average. Additionally, it is entirely possible for emissions to remain below the permitted annual emission rate even though the annual average sulfur content of the charge exceeds 1.0%, depending upon grade characteristics of the coke being produced, and/or outperformance of the FGD control device, etc. Removal of this requirement is requested.	
EQT0031 – SIN-101 **Requirement #343** **LAC 33:III.509**	Requirement states: "Particulate matter (10 microns or less) >= 99.0% removal efficiency from filter manufacturer's certification. Determined as BACT." Although the calculation of PM_{10} emissions from this source is not based upon a specific control efficiency but rather a vendor-guaranteed exit concentration, the removal efficiency should reflect the 99.5% control efficiency determined as BACT for other fabric filter control devices for consistency.	**Done**
EQT0031 – SIN-101 **Requirement #347** **LAC 33:III.509**	Requirement states: "BACT is determined to be countercurrent flow injection of additives combined with good combustion practices." This requirement should make explicit that the BACT determination is for emissions of VOC from this source.	**Corrected**
EQT0021 – PIG-101 **Requirement #774** **LAC 33:III.509**	Requirement states: "Particulate matter (10 microns or less) >= 99.0% removal efficiency from filter manufacturer's certification. Determined as BACT." Although the calculation of PM_{10} emissions from this source is not based upon a specific control efficiency but rather an AP-42 factor, the removal efficiency should reflect the 99.5% control efficiency determined as BACT for other fabric filter control devices for consistency.	**Done**

RLP0015 – STV-101 Requirement #872 **RLP0016 – STV-201 Requirement #892** **LAC 33:III.509**	Requirement states: "Particulate Matter (10 microns or less) <= 0.001 gr/dscf. Determined as BACT." It is not clear if this is a limitation upon particulate loading in the fuel, or in the flue gas. Requirement #876 would seem to indicate a limitation on the fuel, and the conversion of 3 mg/Nm^3 rate provided by the vendor would seem to confirm. The concentration value of particulate in the BFG was not provided by the vendor on a dry basis, and transposing a wet basis rate to a dry basis rate would likely create a situation where compliance could not be achieved. Suggested language: "Blast Furnace Top Gas Fuel Particulate Matter (10 microns or less) <= 0.001 gr/scf. Determined as BACT.	**This is a limitation based upon exhaust gases and will be used to determine compliance during any emissions test.**
RLP0015 – STV-101 Requirement #876 **RLP0016 – STV-201 Requirement #891** **LAC 33:III.509**	Requirement states: "Blast Furnace Top Gas Fuel Sulfur Dioxide <= 0.00874 gr/dscf. Determined as BACT. BACT for SO_2 emissions from blast furnaces and hot blast stoves is no add-on or combustion control other than the low-sulfur BFG fuel." The basis for this limitation is not apparent. The maximum BFG sulfur content is provided in the calculations as 45 mg/Nm^3. This converts to a value of 0.0164 gr/scf. Additionally, the concentration value of sulfur in the BFG was not provided by the vendor on a dry basis and transposing a wet basis rate to a dry basis rate would likely create a situation where compliance could not be achieved. Suggested language: "Blast Furnace Top Gas Fuel Sulfur Dioxide <= 0.0164 gr/scf. Determined as BACT. BACT for SO_2 emissions from blast furnaces and hot blast stoves is no add-on or combustion control other than the low-sulfur BFG fuel."	**This is a limitation based upon exhaust gases and will be used to determine compliance during any emissions test. It was derived from the emission limitation.**

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RLP0015 – STV-101 **RLP0016 – STV-201** **LAC 33:III.1703**	There is no requirement for LAC 33:III.1703 listed for the Blast Furnace Stoves. These sources will burn blast furnace gas, and are subject to this requirement. CRG0002 Power Boilers Common Requirements requirement #725 states: "Do not emit carbon monoxide gases generated during the operation of a gray iron cupola, blast furnace or basic oxygen steel furnace unless they are burned in a direct-flame afterburner or are controlled by other means approved by DEQ. Combustion in the Power Boiler is approved." A similar requirement stating explicitly that the Blast Furnace Stoves are an approved direct-flame control device should be included for STV-101 and -201.	**This was covered by Table 2 of the Part 70 Operating Permit Briefing Sheet. No specific requirement is needed in the Specific Requirements Report.**

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