

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
Optimus Steel, LLC

AUTHORIZING THE OPERATION OF
Optimus Steel Beaumont Mill
IRON AND STEEL MILLS AND FERROALLOY MANUFACTURING

LOCATED AT
Orange County, Texas
Latitude 30° 4' 55" Longitude 94° 4' 28"
Regulated Entity Number: RN100226059

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O1281 Issuance Date: July 17, 2024



For the Commission

Table of Contents

Section	Page
General Terms and Conditions	1
Special Terms and Conditions:	1
Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting.....	1
Additional Monitoring Requirements	8
New Source Review Authorization Requirements	9
Compliance Requirements.....	10
Protection of Stratospheric Ozone	12
Permit Location	12
Permit Shield (30 TAC § 122.148)	12
Attachments	13
Applicable Requirements Summary.....	14
Additional Monitoring Requirements	20
Permit Shield.....	26
New Source Review Authorization References	29
Appendix A.....	33
Acronym List	34
Appendix B.....	35

General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, §113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
 - F. Emission units subject to 40 CFR Part 63, Subpart YYYYY as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, §113.1340 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic

monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under

30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which

condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

C. For visible emissions from all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7); the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(8)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(8)(B)(i) or (ii)
- (iii) For a source subject to 30 TAC § 111.111(a)(8)(A), complying with 30 TAC § 111.111(a)(8)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a source which is required to comply with 30 TAC § 111.111(a)(8)(A) shall be conducted at least once during each calendar quarter unless the source is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of sources operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of sources operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each source in clear view of the observer. The

observer shall be at least 15 feet, but not more than 0.25 mile, away from each source during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(8) and (a)(8)(A)
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(8)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- D. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- E. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- F. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

- G. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)

- 4. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
 - A. When filling stationary gasoline storage vessels (Stage I) for motor vehicle fuel dispensing facilities, constructed prior to November 15, 1992, with transfers to stationary storage tanks located at a facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
 - (i) Title 30 TAC § 115.222(3) (relating to Control Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
 - (ii) Title 30 TAC § 115.222(6) (relating to Control Requirements)
 - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
 - (iv) Title 30 TAC § 115.226(2)(B) (relating to Recordkeeping Requirements)

- 5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

- 6. For the metallic scrap utilized at an electric arc furnace steelmaking facility as specified in 40 CFR Part 63, Subpart YYYYYY, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.1340 incorporated by reference):
 - A. Title 40 CFR § 63.10685(a) and (a)(1), relating to the requirement to prepare and implement a pollution prevention plan
 - B. Title 40 CFR § 63.10685(a) and (a)(2), relating to the control of contaminants (HAPs) from restricted metallic scrap charged to the electric arc furnace
 - C. Title 40 CFR § 63.10685(a)(1), (c), and (c)(3), relating to recordkeeping and reporting requirements
 - D. Title 40 CFR § 63.10690(a), (b), (b)(1), and (b)(2), relating to general provisions

- 7. For scrap utilized at an electric arc furnace steelmaking facility as specified in 40 CFR Part 63, Subpart YYYYYY, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.1340 incorporated by reference):

- A. Title 40 CFR § 63.10685(b), (b)(1), (b)(2), and/or (b)(3), relating to mercury requirements for scrap containing motor vehicle scrap
 - B. Title 40 CFR § 63.10685(b)(1), (b)(2), (b)(3), (c), (c)(1) and/or (c)(2) and 63.10685(c)(3), relating to recordkeeping and reporting requirements for scrap containing motor vehicle scrap
 - C. Title 40 CFR § 63.10685(b)(4), (c), and (c)(3), relating to recordkeeping and reporting requirements for scrap that does not contain motor vehicle scrap
 - D. Title 40 CFR § 63.10690(a), (b), and (b)(3), relating to general provisions
8. For each gasoline dispensing facility, with a throughput of less than 10,000 gallons per month as specified in 40 CFR Part 63, Subpart CCCCCC, the permit holder shall comply with the following requirements (Title 30 TAC, Subchapter C, § 113.1380 incorporated by reference):
- A. Title 40 CFR § 63.11111(e), for records of monthly throughput
 - B. Title 40 CFR § 63.11111(i), for compliance due to increase of throughput
 - C. Title 40 CFR § 63.11111(j), for dispensing from fixed tank into portable tank for on-site delivery
 - D. Title 40 CFR § 63.11113(c), for compliance due to increase of throughput
 - E. Title 40 CFR § 63.11115(a), for operation of the source
 - F. Title 40 CFR § 63.11116(a) and (a)(1) - (4), for work practices
 - G. Title 40 CFR § 63.11116(b), for records availability
 - H. Title 40 CFR § 63.11116(d), for portable gasoline containers
9. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

Additional Monitoring Requirements

10. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
- A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).

- B. The permit holder shall report, consistent with the averaging time identified in the “CAM Summary,” deviations as defined by the deviation limit in the “CAM Summary.” Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the “CAM Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.
 - E. The permit holder shall comply with either of the following requirements for any particulate matter capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective action:
 - (i) Once per year the permit holder shall inspect any fan for proper operation and inspect the capture system used in compliance of CAM for cracks, holes, tears, and other defects; or
 - (ii) Once per year, the permit holder shall inspect for fugitive emissions escaping from the capture system in compliance of CAM by performing a visible emissions observation for a period of at least six minutes in accordance with 40 CFR Part 60, Appendix A, Test Method 22.
 - F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.
11. The permit holder shall comply with the periodic monitoring requirements as specified in the attached “Periodic Monitoring Summary” upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the “Periodic Monitoring Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

- 12. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated April 19, 2024 in the application for project 35538), standard permits, flexible permits, special permits, permits for existing facilities

including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:

- A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
13. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
14. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
15. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
- A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Requirements of the non-rule Air Quality Standard Permit for Pollution Control Projects

Compliance Requirements

16. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
17. Permit holder shall comply with the following 30 TAC Chapter 117 requirements:
- A. The permit holder shall comply with the compliance schedules and submit written notification to the TCEQ Executive Director as required in 30 TAC Chapter 117, Subchapter H, Division 1:
 - (i) For sources in the Beaumont-Port Arthur Nonattainment area, 30 TAC § 117.9000

- B. The permit holder shall comply with the Initial Control Plan unit listing requirement in 30 TAC § 117.150(c) and (c)(1).
18. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) Offsets for Title 30 TAC Chapter 116
 - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
 - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
 - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
19. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4

- (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

20. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
- A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.
 - B. Any on site servicing, maintenance, and repair of fleet vehicle air conditioning using ozone-depleting refrigerants shall be conducted in accordance with 40 CFR Part 82, Subpart B. Permit holders shall ensure that repairs or refrigerant removal are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart B.

Permit Location

21. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

22. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary 15

Applicable Requirements Summary 16

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
DIESEL EG	SRIC ENGINES	N/A	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
EPN-2A	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1151	30 TAC Chapter 111, Nonagricultural Processes	No changing attributes.
EPN-2A	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
EPN-2A	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
F-2	STEEL PLANT UNIT	N/A	63YYYYY	40 CFR Part 63, Subpart YYYYY	No changing attributes.
P-14	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-1	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
P-2	STEEL PLANT UNIT	N/A	63YYYYY	40 CFR Part 63, Subpart YYYYY	No changing attributes.
PWASH	SOLVENT DEGREASING MACHINES	N/A	115E	30 TAC Chapter 115, Degreasing Processes	No changing attributes.
TANK10	STORAGE TANKS/VESSELS	N/A	R5112-C	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
TANK21	STORAGE TANKS/VESSELS	N/A	R5112-C	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
TANK24	STORAGE TANKS/VESSELS	N/A	R5112-C	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
VOCUNLD	LOADING/UNLOADING OPERATIONS	N/A	115C-1	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
DIESEL EG	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.4 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(f) § 63.6625(h) § 63.6625(i) § 63.6640(f)(1) § 63.6640(f)(2) § 63.6640(f)(2)(i) § 63.6640(f)(4) § 63.6640(f)(4)(i)	For each existing emergency stationary CI RICE and black start stationary CI RICE, located at an area source, you must comply with the requirements as specified in Table 2d.4.a-c.	§ 63.6625(i) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6625(i) § 63.6655(e) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)
EPN-2A	EP	R1151	PM	30 TAC Chapter 111, Nonagricultural Processes	§ 111.151(a) § 111.151(b) § 111.151(c)	No person may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable rates specified in Table 1 as follows, except as provided by §111.153 of this title (relating to Emissions Limits for Steam Generators).	** See CAM Summary	None	None
EPN-2A	EP	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See CAM Summary	None	None
EPN-2A	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(B) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream specified in § 115.121(a)(1) of this title with a concentration of VOC < 612 ppmv is exempt from § 115.121(a)(1).	[G]§ 115.125 § 115.126(2) § 115.126(3)(C)	§ 115.126 § 115.126(2) § 115.126(3) § 115.126(3)(C)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
F-2	EU	63YYYYY	PM (Opacity)	40 CFR Part 63, Subpart YYYYY	§ 63.10686(b)(2) § 63.10686(b) § 63.10690(a)	Except as provided in paragraph (c) of this section, you must not discharge or cause the discharge into the atmosphere from an EAF or AOD vessel any gases which exit from a melt shop and, due solely to the operations of any affected EAF(s) or AOD vessel(s), exhibit 6 percent opacity or greater.	[G]§ 60.274a(h) § 60.275a(d) § 60.275a(e)(3) § 60.275a(e)(4) § 60.275a(j) § 63.10686(d) § 63.10686(d)(2) § 63.10686(d)(3) § 63.10690(a) ** See Periodic Monitoring Summary	§ 63.10686(d)(3) § 63.10690(a)	§ 63.10686(d)(4) § 63.10690(a) § 63.10690(b)
P-14	EP	R5121-1	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2) § 115.126(3)(B)	§ 115.126 § 115.126(2) § 115.126(3) § 115.126(3)(B)	None
P-14	EP	R5121-1	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(B) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream specified in §115.121(a)(1) of this title with a concentration of VOC less than 612 parts per million by volume (ppmv) is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(a) § 115.126(3)(C)	§ 115.126 § 115.126(2) § 115.126(3) § 115.126(3)(C)	None
P-2	EU	63YYYYY	PM	40 CFR Part 63, Subpart YYYYY	§ 63.10686(b)(1) § 63.10686(a) § 63.10686(b) § 63.10690(a)	Except as provided in paragraph (c) of this section, you must not discharge or cause the discharge into the atmosphere from an EAF or AOD vessel any gases which exit from a control device and contain in excess of 0.0052 grains of	[G]§ 60.274a(h) § 60.275a(a) § 60.275a(d) § 60.275a(e)(1) § 60.275a(e)(4) § 60.275a(j) § 63.10686(d) [G]§ 63.10686(d)(1) § 63.10686(d)(3) § 63.10686(e)	§ 63.10686(d)(3) § 63.10686(e) § 63.10690(a)	§ 63.10686(d)(4) § 63.10686(e) § 63.10690(a) § 63.10690(b) § 63.10690(b)(4) § 63.10690(b)(6)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						PM per dry standard cubic foot (gr/dscf).	§ 63.10690(a) ** See CAM Summary		
PWASH	EU	115E	VOC	30 TAC Chapter 115, Degreasing Processes	§ 115.412(1) § 115.411(1) § 115.411(2) [G]§ 115.412(1)(A) § 115.412(1)(C) § 115.412(1)(D) [G]§ 115.412(1)(F)	No person shall own or operate a system utilizing a VOC for the cold solvent cleaning of objects without the controls listed in §115.412(1)(A)-(F), except as exempted in §115.411.	[G]§ 115.415(1) § 115.415(3) ** See Periodic Monitoring Summary	None	None
TANK10	EU	R5112-C	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
TANK21	EU	R5112-C	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
TANK24	EU	R5112-C	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
VOCUNLD	EU	115C-1	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 115.212(a)(2) § 115.214(a)(1)(B) § 115.214(a)(1)(D) §	Vapor pressure (at land-based operations). All land-based loading and unloading of VOC with a true vapor pressure less	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					115.214(a)(1)(D)(i)	than 0.5 psia is exempt from the requirements of this division, except as specified.			

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 21

Periodic Monitoring Summary 24

CAM Summary

Unit/Group/Process Information	
ID No.: EPN-2A	
Control Device ID No.: EPN-2A	Control Device Type: Fabric filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R1151
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: Pressure Drop	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: If the measured pressure drop is lower than 1.5 inches (38 mm), or greater than 12 inches (304 mm) of water gauge pressure, perform necessary maintenance on the baghouse to bring the pressure drop to within the acceptable range.	
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: <ul style="list-style-type: none"> ± 0.5 inches water gauge pressure (± 125 pascals); or ± 0.5% of span. 	

CAM Summary

Unit/Group/Process Information	
ID No.: EPN-2A	
Control Device ID No.: EPN-2A	Control Device Type: Fabric filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Pressure Drop	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: If the measured pressure drop is lower than 1.5 inches (38 mm), or greater than 12 inches (304 mm) of water gauge pressure, perform necessary maintenance on the baghouse to bring the pressure drop to within the acceptable range.	
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: <ul style="list-style-type: none"> ± 0.5 inches water gauge pressure (± 125 pascals); or ± 0.5% of span. 	

CAM Summary

Unit/Group/Process Information	
ID No.: P-2	
Control Device ID No.: EPN-2A	Control Device Type: Fabric filter
Applicable Regulatory Requirement	
Name: 40 CFR Part 63, Subpart YYYYY	SOP Index No.: 63YYYYY
Pollutant: PM	Main Standard: § 63.10686(b)(1)
Monitoring Information	
Indicator: Pressure Drop	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: If the measured pressure drop is lower than 1.5 inches (38 mm), or greater than 12 inches (304 mm) of water gauge pressure, perform necessary maintenance on the baghouse to bring the pressure drop to within the acceptable range.	
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: <ul style="list-style-type: none"> ± 0.5 inches water gauge pressure (± 125 pascals); or ± 0.5% of span. 	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: F-2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 63, Subpart YYYYYY	SOP Index No.: 63YYYYYY
Pollutant: PM (Opacity)	Main Standard: § 63.10686(b)(2)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: N/A	
Deviation Limit: Maximum opacity 6 percent	
<p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p>	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: PWASH	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: 115E
Pollutant: VOC	Main Standard: § 115.412(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Monthly	
Averaging Period: N/A	
Deviation Limit: Any monitoring data which indicates that the cold solvent cleaner is not in compliance with the applicable requirements of 30 TAC 115.412(1)(A)-(F).	
Periodic Monitoring Text: Inspect equipment and record data monthly to ensure compliance with any applicable requirements in § 115.412(1)(A)-(F). Any monitoring data which indicates that the cold cleaner is not in compliance with the applicable requirements of § 115.412(1)(A)-(F) shall be considered and reported as a deviation.	

Permit Shield

Permit Shield 27

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
COOLTWR	N/A	40 CFR Part 63, Subpart Q	Not operated with chromium-based water treatment chemicals.
DIESEL EG	N/A	30 TAC Chapter 117, Subchapter B	Stationary diesel engines are exempt.
DIESEL EG	N/A	40 CFR Part 60, Subpart IIII	Commenced construction prior to July 11, 2005.
EPN-2A	N/A	40 CFR Part 60, Subpart AA	Dust handling equipment was constructed before 10/21/74.
EPN-2A	N/A	40 CFR Part 60, Subpart AAa	Dust handling equipment was constructed before 08/17/1983.
F-2	N/A	40 CFR Part 60, Subpart AA	Dust handling equipment was constructed before 10/21/74.
F-2	N/A	40 CFR Part 60, Subpart AAa	Dust handling equipment was constructed before 08/17/1983.
GRP P-27	P-27A, P-27B, P-27C, P-27D, P-27E, P-27F, P-27G, P-27H	30 TAC Chapter 115, Vent Gas Controls	Combustion unit not used as a control device.
GRP P-27	P-27A, P-27B, P-27C, P-27E, P-27F, P-27G, P-27H	30 TAC Chapter 117, Subchapter B	Unit does not meet the definition of a process heater.
GRP-GASTK	L-28, L-29	30 TAC Chapter 115, Loading and Unloading of VOC	Motor vehicle fuel dispensing facilities are exempt.
P-2	N/A	40 CFR Part 60, Subpart AA	Electric Arc Furnace was constructed before 10/21/74.
P-2	N/A	40 CFR Part 60, Subpart AAa	Electric Arc Furnace was constructed before 08/17/1983.
T-29	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Motor vehicle fuel dispensing facilities are exempt.
T-29	N/A	30 TAC Chapter 115, Storage of VOCs	A storage tank with a storage capacity less than

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
			25,000 gallons located at a motor vehicle fuel dispensing facility is exempt from the requirements of this division.
T-29	N/A	40 CFR Part 60, Subpart Kb	This subpart does not apply to vessels located at gasoline service stations.
TANK1	N/A	40 CFR Part 60, Subpart K	Capacity is 40,000 gallons or less.
TANK10	N/A	40 CFR Part 60, Subpart Kb	Capacity less than 10,600 gallons.
TANK21	N/A	40 CFR Part 60, Subpart Kb	Capacity less than 10,600 gallons.
TANK24	N/A	40 CFR Part 60, Subpart Ka	Tank was constructed after 5/18/1978 with a capacity of not more than 40,000 gallons.
TANK7	N/A	40 CFR Part 60, Subpart Kb	Capacity less than 10,600 gallons.

New Source Review Authorization References

New Source Review Authorization References 30

New Source Review Authorization References by Emission Unit 31

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1560M1	Issuance Date: 07/12/2023
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 2448	Issuance Date: 07/12/2023
Authorization No.: 3726	Issuance Date: 07/11/2023
Authorization No.: 82427	Issuance Date: 03/08/2017
Authorization No.: 165142	Issuance Date: 05/25/2021
Authorization No.: 170449	Issuance Date: 09/28/2022
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 4	Version No./Date: 09/12/1989
Number: 5	Version No./Date: 09/12/1989
Number: 7	Version No./Date: 05/04/1994
Number: 8	Version No./Date: 09/12/1989
Number: 35	Version No./Date: 09/12/1989
Number: 36	Version No./Date: 09/12/1989
Number: 44	Version No./Date: 09/12/1989
Number: 45	Version No./Date: 09/12/1989
Number: 53	Version No./Date: 09/12/1989
Number: 58	Version No./Date: 09/23/1982
Number: 102	Version No./Date: 09/23/1982
Number: 106.144	Version No./Date: 09/04/2000
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.317	Version No./Date: 03/14/1997
Number: 106.375	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.473	Version No./Date: 09/04/2000
Number: 107	Version No./Date: 09/12/1989
Number: 112	Version No./Date: 09/12/1989

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
COOLTWR	COOLING TOWERS	8/09/12/1989
DIESEL EG	DIESEL EMERGENCY GENERATOR	5/09/12/1989
EPN-2A	EAF BAGHOUSE STACK	2448, PSDTX1560M1
F-2	EAF MELT SHOP ROOF VENTS	2448, PSDTX1560M1
L-28	LOADING FUGITIVES	2448, PSDTX1560M1
L-29	LOADING FUGITIVES	2448, PSDTX1560M1
P-14	LRF BAGHOUSE	2448, PSDTX1560M1
P-2	EAF	2448, PSDTX1560M1
P-27A	PREHEATER 27A	106.183/09/04/2000
P-27B	PREHEATER 27B	106.183/09/04/2000
P-27C	PREHEATER 27C	2448, PSDTX1560M1
P-27D	PREHEATER 27D	106.183/09/04/2000
P-27E	PREHEATER 27E	106.183/09/04/2000
P-27F	PREHEATER 27F	106.183/09/04/2000
P-27G	PREHEATER 27G	106.183/09/04/2000
P-27H	PREHEATER 27H	106.183/09/04/2000
PWASH	PARTS WASHERS	106.454/11/01/2001, 107/09/12/1989
T-29	STORAGE TANK FUGITIVE AND VENT	2448, PSDTX1560M1
T-29	STORAGE TANK FUGITIVE AND VENT (GASOLINE)	2448, PSDTX1560M1
TANK1	DIESEL STORAGE TANK	58/09/23/1982
TANK10	DIESEL STORAGE TANK	58/09/23/1982

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
TANK21	DIESEL STORAGE TANK	58/09/23/1982
TANK24	DIESEL STORAGE TANK	58/09/23/1982
TANK7	DIESEL STORAGE TANK	5/09/12/1989
VOCUNLD	UNLOADING FOR DIESEL AND LUBE OIL STORAGE TANKS	58/09/23/1982

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Appendix A

Acronym List 34

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table 36

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
2A	Electric Arc Furnace Baghouse Stack	PM	28.71	120.98	3, 4, 5, 22, 24, 25, 27	4, 5, 19, 22, 24, 25, 26, 27	2, 4, 23, 24, 25, 26, 27
		PM ₁₀	25.26	106.46			
		PM _{2.5}	24.98	105.25			
		CO	524.00	1637.50			
		NO _x	92.16	288.00			
		SO ₂	34.56	108.00			
		VOC	35.20	99.15			
Pb	0.17	0.70					
F-2	Electric Arc Furnace Building Fugitives	PM	2.18	6.81	4, 6, 17, 27	4, 6, 19, 21, 26, 27	4, 26, 27
		PM ₁₀	1.26	3.95			
		PM _{2.5}	0.94	2.93			
		CO	1.44	4.51			
		NO _x	0.25	0.79			
		SO ₂	0.10	0.30			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		VOC	0.01	0.03			
		Pb	0.03	0.08			
F-25	Continuous Casting (5)	PM	1.12	3.50	27	19, 26, 27	26, 27
		PM ₁₀	0.65	2.03			
		PM _{2.5}	0.48	1.51			
		VOC	0.32	1.00			
14	Ladle Refining Furnace Baghouse Stack	PM	1.54	6.50	3, 5, 22, 27	5, 19, 22, 26, 27	2, 23, 26, 27
		PM ₁₀	1.23	5.85			
		PM _{2.5}	1.14	4.81			
		CO	20.80	65.00			
		NO _x	2.40	7.50			
		SO ₂	22.85	71.40			
		VOC	1.60	5.00			
		Pb	0.0006	0.0024			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
F-27C	Ladle Preheater	PM	0.09	0.40	3	19	2
		PM ₁₀	0.09	0.40			
		PM _{2.5}	0.09	0.40			
		CO	1.01	4.42			
		NO _x	1.20	5.26			
		SO ₂	0.01	0.03			
		VOC	0.07	0.29			
SCRAPFUG	Steel Scrap Fugitives (5)	PM	0.07	0.27	27	26, 27	27
		PM ₁₀	0.02	0.10			
		PM _{2.5}	< 0.01	0.02			
SCRAPYARD	Steel Scrap Pile Fugitives (5)	PM	-	0.18	27	26, 27	27
		PM ₁₀	-	0.09			
		PM _{2.5}	-	0.01			
MILLSCFUG	Mill Scale Fugitives	PM	< 0.01	< 0.01	27	26, 27	27

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
	(5)	PM ₁₀	< 0.01	< 0.01			
		PM _{2.5}	< 0.01	< 0.01			
MILLSCPILE	Mill Scale Pile Fugitives (5)	PM	-	0.83	27	26, 27	27
		PM ₁₀	-	0.42			
		PM _{2.5}	-	0.06			
29	Stores Gasoline Tank 1,000 Gallon Capacity	VOC	0.01	0.04		19	
31	Stores Gasoline Tank Loading facility	VOC	0.02	0.10		19, 26	
2	Reheat Furnace 2	PM	1.01	3.26	27	19, 26, 27	27
		PM ₁₀	1.01	3.26			
		PM _{2.5}	1.01	3.26			
		CO	11.21	36.02			
		NO _x	11.84	30.62			
		SO ₂	0.08	0.26			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
		VOC	0.73	2.36			
Permit by rule (PBR) sources incorporated by reference. Sources remain authorized by the PBR(s) as listed below:							
PBR Registration No. 109724 (§ 106.144)							
F-13	Lime Silo No. 2 Fabric Filter Stack	PM	0.05	0.24			
		PM ₁₀	0.05	0.24			
		PM _{2.5}	0.03	0.12			
F-14	Lime Silo No. 3 Fabric Filter Stack	PM	0.05	0.24			
		PM ₁₀	0.05	0.24			
		PM _{2.5}	0.03	0.12			
PBR Registration No. 102645 (§ 106.261 and 106.262)							
EAFDUST	EAF Dust Loading System	PM	< 0.01	< 0.01			
		PM ₁₀	< 0.01	< 0.01			
		PM _{2.5}	< 0.01	< 0.01			
Unregistered PBRs (§106.183)							

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
F-27A	Horizontal Preheater at Slide Gate (first floor)	PM	0.09	0.40			
		PM ₁₀	0.09	0.40			
		PM _{2.5}	0.09	0.40			
		CO	1.01	4.42			
		NO _x	1.20	5.26			
		SO ₂	< 0.01	0.03			
		VOC	0.07	0.29			
F-27B	Horizontal Preheater at Slide Gate (first floor)	PM	0.09	0.40			
		PM ₁₀	0.09	0.40			
		PM _{2.5}	0.09	0.40			
		CO	1.01	4.42			
		NO _x	1.20	5.26			
		SO ₂	< 0.01	0.03			
		VOC	0.07	0.29			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
F-27D	Vertical tundish preheater car-1 - at the Caster (2nd Floor)	PM	0.02	0.08			
		PM ₁₀	0.02	0.08			
		PM _{2.5}	0.02	0.08			
		CO	0.19	0.85			
		NO _x	0.23	1.01			
		SO ₂	< 0.01	< 0.01			
		VOC	0.01	0.06			
F-27E	Vertical tundish preheater car-2 - at the Caster (2nd Floor)	PM	0.02	0.08			
		PM ₁₀	0.02	0.08			
		PM _{2.5}	0.02	0.08			
		CO	0.19	0.85			
		NO _x	0.23	1.01			
		SO ₂	< 0.01	< 0.01			
		VOC	0.01	0.06			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
F-27F	Vertical preheater (downstairs by caster)	PM	0.07	0.30			
		PM ₁₀	0.07	0.30			
		PM _{2.5}	0.07	0.30			
		CO	0.75	3.28			
		NO _x	0.89	3.90			
		SO ₂	< 0.01	0.02			
		VOC	0.05	0.21			
F-27G	Tundish Dryer (downstairs by caster)	PM	0.02	0.07			
		PM ₁₀	0.02	0.07			
		PM _{2.5}	0.02	0.07			
		CO	0.17	0.74			
		NO _x	0.20	0.88			
		SO ₂	< 0.01	< 0.01			
		VOC	0.01	0.05			

Major NSR Summary Table

Permit Numbers: 2448 and PSDTX1560M1					Issuance Date: July 12, 2023		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Special Condition/Application Information	Special Condition/Application Information	Special Condition/Application Information
F-27H	Tundish Dryer (downstairs by caster)	PM	0.02	0.07			
		PM ₁₀	0.02	0.07			
		PM _{2.5}	0.02	0.07			
		CO	0.17	0.74			
		NO _x	0.20	0.88			
		SO ₂	< 0.01	< 0.01			
		VOC	0.01	0.05			

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 NO_x - total oxides of nitrogen
 SO₂ - sulfur dioxide
 PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 PM_{2.5} - total particulate matter equal to or less than 2.5 microns in diameter
 CO - carbon monoxide
 Pb - lead
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup and shutdown emissions are included. Maintenance activities, except for those specified in Special Condition No. 21, are not authorized by this permit, and will need separate authorization unless the activity can meet the conditions of 30 TAC §116.119 or 30 TAC 106.263.
- (7) Silos represented to be shut down as of May 2020.



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Optimus Steel, LLC
Authorizing the Construction and Operation of
Steel Manufacturing Facility
Located at Vidor, Orange County, Texas
Latitude 30.081944 Longitude -94.074444

Permits: 2448 and PSDTX1560M1

Amendment Date: July 12, 2023

Expiration Date: June 3, 2026



For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]¹
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m ³ = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO _x = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 2448 and PSDTX1560M1

Emission Limitations

1. This permit authorizes only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. **(04/13)**

Fuel Specifications

2. Fuel for the electric arc furnace (EAF) oxy-fuel sidewall burners (Emission Point Number [EPN] 2A), ladle refining furnace (LRF) (EPN 14), the ladle preheater (EPN F-27C), and reheat furnace 2 (EPN 2) shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). **(7/23)**
3. Upon request by the Executive Director of the TCEQ or the TCEQ Regional Director or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuels used in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. **(03/14)**

Federal Applicability

4. These facilities shall comply with all applicable requirements of the EPA Regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following: **(05/11)**
 - A. Subpart A - General Provisions; and
 - B. Subpart YYYYYY- Electric Arc Furnace Steelmaking Facilities.

Opacity/Visible Emission Limitations

5. Opacity of particulate matter emissions from the EAF Baghouse Stack (EPN 2A) and the Ladle Refining Furnace Baghouse Stack (EPN 14) shall not exceed 5 percent. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A, Test Method 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly. **(01/20)**
6. Opacity of particulate matter emissions from the melt shop shall not exceed 6 percent. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A, Test Method 9. Contributions from uncombined water vapor shall not be included in determining compliance with

this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly. **(04/13)**

Operational Limitations, Work Practices, and Plant Design

7. Annual production values for all sources, except the ladle refining furnace, ladle preheaters, parts washers, lime silos, lime silos baghouse and the stores gasoline tank, are based on and limited to a maximum of 8,428 hours per year. **(08/06)**
8. The total annual production of the EAF [Facility Identification Number (FIN) P-2] shall be limited to a maximum of 1,000,000 tons of steel billets cast and a total of 1,600,000 tons of steel products. **(7/23)**
9. The Ladle Preheater (EPN F-27C) shall be limited to a natural gas firing rate of no more than 21 MMBtu/hr. The Btu/hr rating of the EAF sidewall burners shall not exceed 61 MMBtu/hr. **(01/20)**
10. Plant roads shall be watered, treated with dust suppressant chemicals, oiled or paved, and cleaned, as necessary, to minimize fugitive dust emissions. **(08/99)**
11. The capacity of the transformers that supply electrical power to the EAF shall not exceed 120 MVA each. Two transformers are authorized, one active and one spare, but they shall not be employed simultaneously. **(01/20)**
12. The capacity of the transformers that supply electrical power to the Ladle Refining Furnace (LRF) shall not exceed 20 MVA. Two transformers are authorized, one active and one spare, but they shall not be employed simultaneously. **(08/14)**
13. Lime shall be transported from trucks or railcars in an enclosed conveyor system.
14. Good housekeeping shall be observed throughout the facility to minimize fugitive emissions. All lime spills that have the potential to become airborne shall be cleaned up and contained or dampened on a weekly basis. **(08/99)**
15. Fabric filter baghouses properly installed and in good working order shall control particulate matter (PM) emissions from the EAF (EPN 2A) and the LRF (EPN 14). **(08/06)**
16. Only oil filters that are drained and crushed shall be accepted by the holder of this permit. There shall be no running or dripping oil from the crushed filters. The total weight of oil filters shall not exceed 300 tons per month.
17. All hooding, duct, and collection systems shall be effective in capturing emissions from the intended equipment and in controlling fugitive emissions from the building. The hooding and duct system shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the emission capture system. **(08/99)**
18. If significant air pollution emissions and/or nuisance conditions occur, additional controls may be required.
19. All equipment covered by this permit that has the potential to emit air contaminants shall be clearly labeled. Permitted emission points shall be identified by labeling corresponding to the emission

point numbering on the attached table "Emission Sources – Maximum Allowable Emission Rates"(MAERT); other facilities shall be identified by labeling corresponding to the emission point numbering used in the most recent emissions inventory submitted to the TCEQ.

20. The following sources are authorized by the specified permit by rule (PBR): **(01/20)**

Source	PBR	Registration No.
Lime Silos No. 2 and 3	106.144	109724
EAF Dust Loading System	106.261 and 106.262	102645
Ladle Preheaters	106.183	N/A

Maintenance Activities

21. Maintenance activities in the meltshop are authorized, including, but not limited to pneumatic cleaning, vacuum cleaning, and mechanical cleaning in the meltshop; repair and replacement of equipment and components; and replacement of refractory and insulation. Maintenance activities conducted on days the furnace and baghouse do not operate shall be recorded **(04/13)**

Demonstration of Continuous Compliance

22. The holder of this permit shall install, calibrate, and maintain a device to monitor pressure drop in baghouses 2A and 14: **(05/11)**
- A. The monitoring device shall be calibrated in accordance with the manufacturers specifications and shall be calibrated at least annually and shall be accurate to within a range of ± 0.5 -inch water gauge pressure (± 125 pascals); or a span of ± 0.5 percent. **(05/11)**
 - B. The differential pressure across baghouse 2A shall be read and recorded at least four times per hour. If the measured hourly average pressure drop is lower than 1.5 inch (38 mm) of water gauge pressure or greater than 12 inches (304 mm) of water gauge pressure, the permittee shall perform necessary maintenance on the baghouse to bring the pressure drop to within the acceptable range. **(10/17)**
 - C. The differential pressure across EPN 14 shall be measured and recorded at least once per each day that the Ladle Refining Furnace operates. If the measured pressure drop is lower than 4 inch (101.6 mm) of water gauge pressure or greater than 13 inch (330 mm) of water gauge pressure, the permittee shall perform necessary maintenance on the baghouse to bring the pressure drop to within the acceptable range. **(06/11)**
 - D. The minimum and maximum pressure drop for the baghouses shall be established using the most appropriate of the following: the most recent performance test data, the manufacture's recommendations, engineering calculations, and/or historical data. **(05/11)**
 - E. Upon demonstration that operating conditions upon which the minimum or maximum differential pressure would ever need to be changed, the TCEQ Executive Director may grant a request to re-establish the differential pressure limit. **(05/11)**
 - F. The permittee shall continuously operate the differential pressure monitoring system(s) when the fabric filter baghouse(s) are operating. **(05/11)**

23. The TCEQ Regional Office shall be notified as soon as possible after the discovery of any monitor malfunction which is expected to result in more than 24 hours of lost data. Supplemental visible emission monitoring may be required at the discretion of the appropriate TCEQ Regional Director in case of extended monitor downtime. Necessary corrective action shall be taken if downtime exceeds 5 percent of the (emission sources) operating hours in a quarter. Failure to complete any corrective action as directed by the TCEQ Regional Office may be deemed a violation of the permit. **(05/11)**

Sampling Requirements

24. The TCEQ Executive Director, or his designated representative, may require the holder of this permit to provide the means for and perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Electric Arc Furnace Baghouse Stack (EPN 2A) as specified in Special Condition No. 25. **(08/14)**
25. Upon request, the holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Electric Arc Furnace Baghouse Stack (EPN 2A). Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Reference Method 10 for carbon monoxide (CO) and Reference Method 5, modified to include back-half condensables. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.
- A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting.
- The notice shall include:
- (1) Date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.
- The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.
- A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified shall be submitted to the TCEQ Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Regional Office.
- B. Air contaminants to be tested include (but are not limited to) CO and/or PM. **(08/99)**

- C. Sampling shall occur within 60 days after initial start-up of the revised EAF and at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of Title 40 Code of Federal Regulations Part 60 (40 CFR 60) and 40 CFR 61 requires EPA approval, and requests shall be submitted to the TCEQ Regional office. **(08/99)**
- D. The plant shall operate at maximum production rates during stack emission testing. Primary operating parameters that enable determination of production rate shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the plant is unable to operate at maximum rates during testing, then future production rates may be limited to the rates established during testing, plus 10 percent. Additional stack testing may be required when higher production rates are achieved. **(08/99)**
- E. Two copies of the final sampling report shall be forwarded to the TCEQ within 30 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:
 - One copy to the TCEQ Beaumont Regional Office.
 - One copy to the TCEQ Austin Office of Air, Air Permits Division.

Recordkeeping Requirements

- 26. Records shall be maintained at this facility and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with special conditions. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following: **(05/11)**
 - A. Hours of operation for all sources, except the ladle refining furnace, ladle preheaters, lime silos, lime silos baghouse, and the gasoline storage tank;
 - B. Annual production of steel billets cast (in tons/year);
 - C. The total weight of the oil filters processed monthly (in tons);
 - D. Melt shop opacity readings and baghouse 2A and 14 differential pressure readings; **(05/11)**
 - E. Quarterly opacity and visible emissions observations required by Special Condition Nos. 5 and 6, and **(03/14)**
 - F. Records of the maintenance activities required by Special Condition No. 21 **(04/13)**
 - G. Records of monthly combined natural gas usage for the Ladle Preheaters (EPNs F-27A, 27B, 27C, 27D, 27E, 27F, 27G and 27H). **(7/23)**
 - H. Records of monthly natural gas usage for Reheat Furnace 2 (EPN 2). **(7/23)**
 - I. Records of monthly steel scrap usage, mill scale throughput and slag throughput. **(7/23)**

Could Have Accommodated Requirements

- 27. The project associated with the permit application PI-1 dated November 29, 2022, TCEQ NSR Project No. 350718, was determined to not be subject to major new source review through the use

of projected actual emission rates for one or more facilities associated with the project. Actual emissions from the sources using a projected actual as listed in the table of this special condition shall be monitored as represented in the application and records maintained, and reports provided in accordance with 30 TAC §116.127. Records shall be maintained for five calendar years from the resumption of regular operations. Records shall include the date of resumption of regular operations after the project change.

Pollutant: VOC							
Application project emissions increase: 32.95 tpy							
FIN	EPN	Permit No.	Baseline Actual Emissions (tpy)	Post Project Allowable (tpy)	Projected Actual Emissions (tpy)	Correction (tpy)	Monitoring Special Condition Nos.
P-2	2A	2448	60.65	99.15	99.15	10.20*	26.26.B
P-2A	F-2	2448	0.02	0.03	0.03	0.00*	26.B
P-14	14	2448	3.06	5.00	5.00	0.51*	26.B
P-25	F-25	2448	0.61	1.00	1.00	0.10*	26.B
P-27	F-27	2448	1.27	2.07	2.07	0.23**	26.G
2	2	2448	0.00	2.36	2.36	-	26.H
Total Baseline Actual (tpy)			65.61				
*Melt Shop emissions calculated based on the amount of steel cast production. The calculated could have accommodated (CHA) emission rate for the Melt Shop EAF emissions are based on the highest monthly steel production during the baseline period (59,552 tons steel cast during July 2017) x 12 month/year. Additionally, the monthly maximum production rate includes weekly shutdown periods which are typically 15 hours in duration for maintenance. **Ladle Preheaters emissions are calculated based on natural gas usage measured for the combined Ladle Preheaters. The combined calculated CHA emission rate is based on the highest monthly natural gas usage during the baseline period (45.3 MMscf/month during January 2017) x 12 months/year.							

Pollutant: PM							
Application project emissions increase: 8.85 tpy							
FIN	EPN	Permit/PBR No.	Baseline Actual Emissions (tpy)	Post Project Allowable (tpy)	Projected Actual Emissions (tpy)	Correction (tpy)	Monitoring Special Condition Nos.
P-2	2A	2448	50.84	60.49	60.49	6.63*	26.A
P-2A	F-2	2448	4.09	6.81	6.81	0.78**	26.B
P-14	14	2448	2.87	3.25	3.25	0.37*	26.A
P-25	F-25	2448	2.10	3.50	3.50	0.40**	26.B
P-10	F-10	2448	0.76	0.00	0.00	-	N/A†
P-11	F-11	2448	0.82	0.00	0.00	-	N/A†
P-12	P-12	2448	2.00	0.00	0.00	-	N/A†
P-13	F-13	109724	0.00	0.47	0.47	-	30 TAC §106.8(c)(5)
P-14	F-14	109724	0.00	0.47	0.47	-	
P-27	F-27	2448	1.79	2.86	2.86	0.27***	26.G
2	2	2448	0.00	3.26	3.26	-	26.H
EAFDUST	EAFDUST	102645	0.004	0.006	0.006	-	30 TAC §106.8(c)(5)
SLAGPLANT	SLAGPLANT	21717	0.16	0.33	0.33	-	26.I

SCRAPFUG	SCRAPFUG	2448	0.00	0.27	0.27	-	26.I
MILLSCFUG	MILLSCFUG	2448	0.00	0.0011	0.0011	-	26.I
SCRAPYARD	SCRAPYARD	2448	0.00	0.18	0.18	-	26.I
MILLSCPILE	MILLSCPILE	2448	0.00	0.83	0.83	-	26.I
Total Baseline Actual (tpy)			65.274				
<p>*PM emissions from the EAF and LRF Baghouses are calculated based on air flow, outlet grain loading, and hours of operation. The calculated CHA emission rates are based on the highest monthly EAF hours of operation during the baseline period (698.4 hr/month during October 2017) x 12 months/year.</p> <p>**Melt shop emissions calculated based on the amount of steel cast production. The calculated could have accommodated (CHA) emission rate for the Melt Shop EAF emissions are based on the highest monthly steel production during the baseline period (59,552 tons steel cast during July 2017) x 12 month/year. Additionally, the monthly maximum production rate includes weekly shutdown periods which are typically 15 hours in duration for maintenance.</p> <p>*** Ladle Preheaters emissions are calculated based on natural gas usage measured for the combined Ladle Preheaters. The combined calculated CHA emission rate is based on the highest monthly natural gas usage during the baseline period (45.3 MMsfc/month during January 2017) x 12 months/year.</p> <p>† Monitoring requirements only applicable to those sources which utilized projected actuals.</p>							

Pollutant: PM₁₀							
Application project emissions increase: 10.91 tpy							
FIN	EPN	Permit/ PBR No.	Baseline Actual Emissions (tpy)	Post Project Allowable (tpy)	Projected Actual Emissions (tpy)	Correction (tpy)	Monitoring Special Condition Nos.
P-2	2A	2448	89.47	106.46	106.46	11.68*	26.A
P-2A	F-2	2448	2.37	3.95	3.95	0.45**	26.B
P-14	14	2448	5.04	5.72	5.72	0.65*	26.A
P-25	F-25	2448	1.22	2.03	2.03	0.23**	26.B
P-10	F-10	2448	0.38	0.00	0.00	-	N/A†
P-11	F-11	2448	0.41	0.00	0.00	-	N/A†
P-12	P-12	2448	1.02	0.00	0.00	-	N/A†
P-13	F-13	109724	0.00	0.47	0.47	-	30 TAC
P-14	F-14	109724	0.00	0.47	0.47	-	§106.8(c)(5)
P-27	F-27	2448	1.79	2.86	2.86	0.27***	26.G
2	2	2448	0.00	3.26	3.26	-	26.H
EAFDUST	EAFDUST	102645	0.0013	0.0023	0.0023	-	30 TAC §106.8(c)(5)
SLAGPLANT	SLAGPLANT	21717	0.06	0.11	0.11	-	26.I
SCRAPFUG	SCRAPFUG	2448	0.00	0.10	0.10	-	26.I
MILLSCFUG	MILLSCFUG	2448	0.00	0.0003	0.0003	-	26.I
SCRAPYARD	SCRAPYARD	2448	0.00	0.09	0.09	-	26.I
MILLSCPILE	MILLSCPILE	2448	0.00	0.41	0.41	-	26.I
Total Baseline Actual (tpy)			101.76				
<p>*PM emissions from the EAF and LRF Baghouses are calculated based on air flow, outlet grain loading, and hours of operation. The calculated CHA emission rates are based on the highest monthly EAF hours of operation during the baseline period (698.4 hr/month during October 2017) x 12 months/year.</p> <p>**Melt shop emissions calculated based on the amount of steel cast production. The calculated could have accommodated (CHA) emission rate for the Melt Shop EAF emissions are based on the highest monthly</p>							

steel production during the baseline period (59,552 tons steel cast during July 2017) x 12 month/year. Additionally, the monthly maximum production rate includes weekly shutdown periods which are typically 15 hours in duration for maintenance.
 † Monitoring requirements only applicable to those sources which utilized projected actuals.
 *** Ladle Preheaters emissions are calculated based on natural gas usage measured for the combined Ladle Preheaters. The combined calculated CHA emission rate is based on the highest monthly natural gas usage during the baseline period (45.3 MMscf/month during January 2017) x 12 months/year.

Pollutant: PM_{2.5}							
Application project emissions increase: 9.90 tpy							
FIN	EPN	Permit/ PBR No.	Baseline Actual Emissions (tpy)	Post Project Allowable (tpy)	Projected Actual Emissions (tpy)	Correction (tpy)	Monitoring Special Condition Nos.
P-2	2A	2448	88.45	105.25	105.25	11.54*	26.A
P-2A	F-2	2448	1.76	2.93	2.93	0.34**	26.B
P-14	14	2448	4.99	5.66	5.66	0.64*	26.A
P-25	F-25	2448	0.90	1.51	1.51	0.17**	26.B
P-10	F-10	2448	0.38	0.00	0.00	-	N/A†
P-11	F-11	2448	0.41	0.00	0.00	-	N/A†
P-12	P-12	2448	0.30	0.00	0.00	-	N/A†
P-13	F-13	109724	0.00	0.12	0.12	-	30 TAC
P-14	F-14	109724	0.00	0.12	0.12	-	§106.8(c)(5)
P-27	F-27	2448	1.79	2.86	2.86	0.27***	26.G
2	2	2448	0.00	3.26	3.26	-	26.H
EAFDUST	EAFDUST	102645	0.0013	0.0023	0.0023	-	30 TAC §106.8(c)(5)
SLAGPLANT	SLAGPLANT	21717	0.01	0.06	0.06	-	26.I
SCRAPFUG	SCRAPFUG	2448	0.00	0.02	0.02	-	26.I
MILLSCFUG	MILLSCFUG	2448	0.00	0.0001	0.0001	-	26.I
SCRAPYARD	SCRAPYARD	2448	0.00	0.01	0.01	-	26.I
MILLSCPILE	MILLSCPILE	2448	0.00	0.06	0.06	-	26.I
Total Baseline Actual (tpy)			98.99				
*PM emissions from the EAF and LRF Baghouses are calculated based on air flow, outlet grain loading, and hours of operation. The calculated CHA emission rates are based on the highest monthly EAF hours of operation during the baseline period (698.4 hr/month during October 2017) x 12 months/year. **Melt shop emissions calculated based on the amount of steel cast production. The calculated could have accommodated (CHA) emission rate for the Melt Shop EAF emissions are based on the highest monthly steel production during the baseline period (59,552 tons steel cast during July 2017) x 12 month/year. Additionally, the monthly maximum production rate includes weekly shutdown periods which are typically 15 hours in duration for maintenance. *** Ladle Preheaters emissions are calculated based on natural gas usage measured for the combined Ladle Preheaters. The combined calculated CHA emission rate is based on the highest monthly natural gas usage during the baseline period (45.3 MMscf/month during January 2017) x 12 months/year. † Monitoring requirements only applicable to those sources which utilized projected actuals.							

Pollutant: CO_{2e}
Application project emissions increase: 72,726 tpy

FIN	EPN	Permit No.	Baseline Actual Emissions (tpy)	Projected Actual Emissions (tpy)	Correction (tpy)	Monitoring Special Condition Nos.
GHG Melt Shop Production		N/A	36,223	65,622	20,304*	30 TAC § 116.164(b)
GHG Melt Shop Combustion		N/A	27,394	44,781	4,934*	
2	2	2448	0.00	51,177	-	26.H
Total Baseline Actual (tpy)			63,617			
*Melt shop emissions calculated based on the amount of steel cast production. The calculated could have accommodated (CHA) emission rate for the Melt Shop EAF emissions are based on the highest monthly steel production during the baseline period (59,552 tons steel cast during July 2017) x 12 month/year. Additionally, the monthly maximum production rate includes weekly shutdown periods which are typically 15 hours in duration for maintenance.						

A report is due to the Executive Director in any calendar year in which the actual emissions for the project exceed the total baseline actual emissions in the table above by the netting significant emission rates in the table below, and a projected actual emission for any facility is exceeded in accordance with 116.127(d).

Contaminant	VOC	PM	PM ₁₀	PM _{2.5}	CO _{2e}
Significant Threshold	40	25	15	10	75,000

If netting is triggered during the project and a projected actual emission is exceeded, and actual emissions do not exceed the netting significant emission rate for the calendar year, the permit holder will maintain an emissions record for the calendar year and no report is required.

Date: July 12, 2023

Emission Sources - Maximum Allowable Emission Rates

Permit Number 2448 and PSDTX1560M1

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
2A	Electric Arc Furnace Baghouse Stack	PM	28.71	120.98
		PM ₁₀	25.26	106.46
		PM _{2.5}	24.98	105.25
		CO	524.00	1637.50
		NO _x	92.16	288.00
		SO ₂	34.56	108.00
		VOC	35.20	99.15
		Pb	0.17	0.70
F-2	Electric Arc Furnace Building Fugitives	PM	2.18	6.81
		PM ₁₀	1.26	3.95
		PM _{2.5}	0.94	2.93
		CO	1.44	4.51
		NO _x	0.25	0.79
		SO ₂	0.10	0.30
		VOC	0.01	0.03
		Pb	0.03	0.08
F-25	Continuous Casting (5)	PM	1.12	3.50
		PM ₁₀	0.65	2.03
		PM _{2.5}	0.48	1.51
		VOC	0.32	1.00
14	Ladle Refining Furnace Baghouse Stack	PM	1.54	6.50
		PM ₁₀	1.23	5.85
		PM _{2.5}	1.14	4.81
		CO	20.80	65.00
		NO _x	2.40	7.50

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		SO ₂	22.85	71.40
		VOC	1.60	5.00
		Pb	0.0006	0.0024
F-27C	Ladle Preheater	PM	0.09	0.40
		PM ₁₀	0.09	0.40
		PM _{2.5}	0.09	0.40
		CO	1.01	4.42
		NO _x	1.20	5.26
		SO ₂	0.01	0.03
		VOC	0.07	0.29
SCRAPFUG	Steel Scrap Fugitives (5)	PM	0.07	0.27
		PM ₁₀	0.02	0.10
		PM _{2.5}	< 0.01	0.02
SCRAPYARD	Steel Scrap Pile Fugitives (5)	PM	-	0.18
		PM ₁₀	-	0.09
		PM _{2.5}	-	0.01
MILLSCFUG	Mill Scale Fugitives (5)	PM	< 0.01	< 0.01
		PM ₁₀	< 0.01	< 0.01
		PM _{2.5}	< 0.01	< 0.01
MILLSCPILE	Mill Scale Pile Fugitives (5)	PM	-	0.83
		PM ₁₀	-	0.42
		PM _{2.5}	-	0.06
29	Stores Gasoline Tank 1,000 Gallon Capacity	VOC	0.01	0.04
31	Stores Gasoline Tank Loading facility	VOC	0.02	0.10
2	Reheat Furnace 2	PM	1.01	3.26
		PM ₁₀	1.01	3.26
		PM _{2.5}	1.01	3.26
		CO	11.21	36.02

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		NO _x	11.84	30.62
		SO ₂	0.08	0.26
		VOC	0.73	2.36
Permit by rule (PBR) sources incorporated by reference. Sources remain authorized by the PBR(s) as listed below:				
PBR Registration No. 109724 (§ 106.144)				
F-13	Lime Silo No. 2 Fabric Filter Stack	PM	0.05	0.24
		PM ₁₀	0.05	0.24
		PM _{2.5}	0.03	0.12
F-14	Lime Silo No. 3 Fabric Filter Stack	PM	0.05	0.24
		PM ₁₀	0.05	0.24
		PM _{2.5}	0.03	0.12
PBR Registration No. 102645 (§ 106.261 and 106.262)				
EAFDUST	EAF Dust Loading System	PM	< 0.01	< 0.01
		PM ₁₀	< 0.01	< 0.01
		PM _{2.5}	< 0.01	< 0.01
Unregistered PBRs (§106.183)				
F-27A	Horizontal Preheater at Slide Gate (first floor)	PM	0.09	0.40
		PM ₁₀	0.09	0.40
		PM _{2.5}	0.09	0.40
		CO	1.01	4.42
		NO _x	1.20	5.26
		SO ₂	< 0.01	0.03
		VOC	0.07	0.29
F-27B	Horizontal Preheater at Slide Gate (first floor)	PM	0.09	0.40
		PM ₁₀	0.09	0.40
		PM _{2.5}	0.09	0.40
		CO	1.01	4.42
		NO _x	1.20	5.26

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		SO ₂	< 0.01	0.03
		VOC	0.07	0.29
F-27D	Vertical tundish preheater car-1 - at the Caster (2nd Floor)	PM	0.02	0.08
		PM ₁₀	0.02	0.08
		PM _{2.5}	0.02	0.08
		CO	0.19	0.85
		NO _x	0.23	1.01
		SO ₂	< 0.01	< 0.01
		VOC	0.01	0.06
F-27E	Vertical tundish preheater car-2 - at the Caster (2nd Floor)	PM	0.02	0.08
		PM ₁₀	0.02	0.08
		PM _{2.5}	0.02	0.08
		CO	0.19	0.85
		NO _x	0.23	1.01
		SO ₂	< 0.01	< 0.01
		VOC	0.01	0.06
F-27F	Vertical preheater (downstairs by caster)	PM	0.07	0.30
		PM ₁₀	0.07	0.30
		PM _{2.5}	0.07	0.30
		CO	0.75	3.28
		NO _x	0.89	3.90
		SO ₂	< 0.01	0.02
		VOC	0.05	0.21
F-27G	Tundish Dryer (downstairs by caster)	PM	0.02	0.07
		PM ₁₀	0.02	0.07
		PM _{2.5}	0.02	0.07
		CO	0.17	0.74
		NO _x	0.20	0.88

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		SO ₂	< 0.01	< 0.01
		VOC	0.01	0.05
F-27H	Tundish Dryer (downstairs by caster)	PM	0.02	0.07
		PM ₁₀	0.02	0.07
		PM _{2.5}	0.02	0.07
		CO	0.17	0.74
		NO _x	0.20	0.88
		SO ₂	< 0.01	< 0.01
		VOC	0.01	0.05

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - total particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

Pb - lead

(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.

(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(6) Planned startup and shutdown emissions are included. Maintenance activities, except for those specified in Special Condition No. 21, are not authorized by this permit, and will need separate authorization unless the activity can meet the conditions of 30 TAC §116.119 or 30 TAC 106.263.

(7) Silos represented to be shut down as of May 2020.

Date: July 12, 2023