

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMITS

In the matter of an  
Application for Permits by:

DER File Nos. AC 16-193733  
AC 16-193734  
Duval County

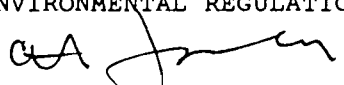
Mr. Alton W. Davis  
Division Manager  
Florida Steel Corporation  
7973 Rebar Road  
Baldwin, FL 32234

Enclosed are permits, Nos. AC 16-193733 and AC 16-193734, to reflect a revision of the PSD-tracked pollutants established in the original permitting activity that were subject to a one-time test requirement for verification purposes. The affected sources, an electric arc furnace and a billet reheat furnace, are located at Florida Steel Corporation's facility in Baldwin, Duval County, Florida. These permits are issued pursuant to Sections 403, Florida Statutes.

Any party to these Orders (permits) has the right to seek judicial review of the permits pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and, by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

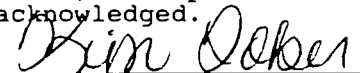
  
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMITS and all copies were mailed before the close of business on 9-3-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.



(Clerk)

9-3-92

(Date)

Copies furnished to:

A. Kutyna, NE District  
R. Roberson, DCAQD  
R. S. Sholtes, Ph.D., P.E., RSS  
J. Alves, Esq., HBG&S

Final Determination

Florida Steel Corporation-Baldwin Mill  
Duval County  
Baldwin, Florida

Construction Permit Nos.  
AC 16-193733  
AC 16-193734

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

August 28, 1992

Final Determination

Florida Steel Corporation-Baldwin Mill

Duval County

The construction permit application packages and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in the Florida Times-Union on July 25, 1992. The Technical Evaluation and Preliminary Determination of the revised construction permits was distributed on July 21, 1992, and available for public inspection at the Department's Northeast District office, the Department's Bureau of Air Regulation office, and the Duval County Air Quality Division office.

There were no comments received during the public notice period. Therefore, it is recommended that the construction permits be issued as drafted.

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

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TERRILL A. SMITH  
OF COUNSEL  
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WILLIAM D. PRESTON  
CAROLYN S. RAEPPEL  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

August 10, 1992

RECEIVED

AUG 10 1992

Bureau of  
Air Regulation

BY HAND-DELIVERY

Mr. Bruce Mitchell, P.E.  
Bureau of Air Regulation  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road, Room 310D  
Tallahassee, FL 32399-2400

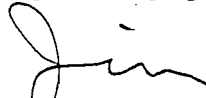
Re: Florida Steel Corporation  
Baldwin Mill

Dear Bruce:

Enclosed is the original of the publication affidavit confirming that the Notice of Intent to Issue for the Baldwin Mill construction permits was published in the Florida Times-Union on June 25, 1992.

Thank you for your assistance in this matter.

Very truly yours,



James S. Alves

/kkm

Enclosure

cc (w/ enc.): Alton Davis  
Luis Nieves  
Dr. Robert Sholtes  
*B. Mitchell*  
*G. Kestner, WE Wist*  
*R. Robinson, DE AQD*

AUG 7 1992

BEST AVAILABLE COPY

Hopping Boyd Green &amp; Sam

**FLORIDA PUBLISHING COMPANY**  
 Publisher  
 JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }  
 COUNTY OF DUVAL }

Before the undersigned authority personally appeared \_\_\_\_\_

Janie Likens \_\_\_\_\_ who on oath says that he is

Legal Ad Rep \_\_\_\_\_ of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the  
 attached copy of advertisement, being a \_\_\_\_\_ Legal Notice

in the matter of \_\_\_\_\_ Notice of Intent to Issue

in the \_\_\_\_\_ Court,

was published in THE FLORIDA TIMES-UNION in the issues of \_\_\_\_\_

July 25, 1992

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me  
 this 30 \_\_\_\_\_ day of \_\_\_\_\_

July \_\_\_\_\_ A.D. 19 92

Notary Public,  
 State of Florida at Large.

My Commission Expires \_\_\_\_\_  
 Notary Public, State of Florida

DA Commission Expires Feb. 7, 1994  
 Bonded Third Party Insurance Inc.

The Department of Environmental Regulation, by press notice of its intent to issue revised construction permits to Florida East Corporation, 9772 Reber Road, Seaside, Duval County, Florida 32254, to reflect the results of a one-time test verification requirement on various PSD-tracked pollutants, because the actual emissions were higher than the projected potential emissions. The previous Department action was a modification to the existing electric arc-furnace and the blast furnace to allow an increase in the permitted hours of operation and the required pollutant emissions; and, to account for the potential emissions of the PSD-tracked pollutants (one-time test verification requirement). A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S. The Petition shall contain the following information:

- The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- A statement of how and when each petitioner received notice of the Department's action or proposed action;
- A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- A statement of the material facts disputed by Petitioner, if any;
- A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the requests/applications have the right to petition to become a party to the proceedings. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Department of Environmental Regulation, North West District, 7825 Baymeadows Way, Jacksonville, Florida 32256-7577. Duval County Air Quality Division, 421 West Church Street, Suite #12, Jacksonville, Florida 32202-3111. Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**

Florida Steel Corporation  
P. O. Box 518  
Baldwin, Florida 32234

**Permit Number:** AC 16-193733

**Expiration Date:** May 31, 1993

**County:** Duval

**Latitude/Longitude:** 30°16'53"N  
81°58'50"W

**Project:** Billet Reheat Furnace

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the revision of the construction permit issued June 28, 1991 [AC 16-193733: Billet Reheat Furnace (BRF)], in order to differentiate between the allowable and the PSD-tracked potential pollutant emissions established in the referenced construction permit. The BRF will be fired primarily on natural gas, but will be allowed up to 350 hrs/yr to fire No. 4 fuel oil at a maximum heat input of  $185 \times 10^6$  Btu/hr. The No. 4 fuel oil will be limited to a maximum sulfur content of 0.7%, by weight. There is no control system associated with the BRF operation. The project will occur at the permittee's facility located at 7973 Rebar Road in Baldwin, Duval County, Florida. The UTM coordinates are Zone 17, 405.7 km East and 3350.2 km North.

The Standard Classification Codes are: Steel Production - 3312

o BRF: 3-03-009-33 Tons Produced

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments, drawings, and supplementary information, except as otherwise noted in the General and Specific Conditions.

**Attachments to be Incorporated:**

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received March 12, 1991.
2. Technical Evaluation and Preliminary Determination dated May 22, 1991.

**PERMITTEE:**  
Florida Steel Corporation

**Permit Number:** AC 16-193733  
**Expiration Date:** May 31, 1993

**Attachments cont.:**

3. Construction permit (AC 16-193733) issued June 28, 1991.
4. Mr. James S. Alves' letter with enclosure (02/13/92 test report) received March 27, 1992.
5. Intent to Issue package, which includes a revised construction permit (AC 16-193733), dated July 17, 1992.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.



**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193733**  
**Expiration Date: May 31, 1993**

**GENERAL CONDITIONS:**

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The Billet Reheat Furnace (BRF) is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).

2. The BRF is permitted to operate a maximum of 8300 hrs/yr.

3. The BRF is primarily fired on natural gas at a maximum heat input of  $185 \times 10^6$  Btu/hr ( $1.78 \times 10^5$  ft<sup>3</sup>); however, the BRF is permitted to fire No. 4 fuel oil at a maximum heat input of  $185 \times 10^6$  Btu/hr ( $1.25 \times 10^3$  gals/hr). The No. 4 fuel oil will be limited to a maximum sulfur content of 0.7%, by weight. The BRF is permitted to fire No. 4 fuel oil for up to 350 hrs/yr.

4. The maximum total process input and product rates are 90 billet tons per hour (bTPH) and 440,172 bTPY steel.

5. The BRF is subject to the visible emission standard of "less than 20% opacity" pursuant to F.A.C. Rule 17-2.610(2).

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

6. For PSD tracking purposes, the projected potential pollutant emissions are:

<u>Pollutant</u>	<u>Natural Gas</u>	<u>No. 4 Fuel Oil</u>
o PM/PM <sub>10</sub> :	0.3 lbs/hr; 1.2 TPY	4.9 lbs/hr; 0.9 TPY
o SO <sub>2</sub> :	0.6 lbs/hr; 2.4 TPY	76.4 lbs/hr; 13.4 TPY
o NOx:	13.8 lbs/hr; 54.9 TPY	21.6 lbs/hr; 3.8 TPY
o CO:	3.5 lbs/hr; 13.9 TPY	3.5 lbs/hr; 0.6 TPY
o HC:	0.3 lbs/hr; 1.2 TPY	0.7 lbs/hr; 0.1 TPY

Note: For the pollutant emission calculations, the permitted hours of operation are 8300 hrs/yr and based on the following:

- o Natural Gas: 7950 hrs/yr.
- o No. 4 Fuel Oil: 350 hrs/yr.
- o Maximum heat input for all fuels is  $185 \times 10^6$  Btu/hr.

7. For testing purposes and NSPS applicability purposes, the maximum product rate of the BRF is 90 bTPH steel. For PSD purposes, the maximum product rate of the BRF is 440,172 bTPY steel.

8. Test methods and procedures shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1991 version):

a. Natural Gas firing

- (1) The initial and subsequent compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively. The compliance tests shall be conducted concurrently, unless inclement weather interferes.
- (2) Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).

b. No. 4 Fuel Oil firing

- (1) For verification purposes and one-time testing requirement to establish the actual emissions/emission rate, compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively. The compliance tests shall be conducted concurrently, unless inclement weather interferes.
- (2) For verification purposes and one-time testing requirement to establish the actual emissions/emission rate(s), compliance tests for SO<sub>2</sub>, NOx, CO and VOC shall be conducted using EPA Methods 6, 7, 10 and 25A, respectively.

**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193733**  
**Expiration Date: May 31, 1993**

**SPECIFIC CONDITIONS:**

- (3) Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).
  - (4) The above compliance tests are to be conducted the next time that No. 4 fuel oil is being fired in the BRF.
9. For the BRF, the permittee is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operations-Problems.
10. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
11. The Duval County Air Quality Division (DCAQD) office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2). The test report(s) shall be submitted to the DCAQD office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).
12. Any change to the BRF pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.
13. This permit supersedes all other air permits issued for the BRF.
14. A log book shall be maintained recording, at a minimum, the date(s) and the beginning and ending "clock time(s)" of operation while firing No. 4 fuel oil.
15. An annual operation report shall be submitted to the DCAQD office by March 1 of each calendar year reporting, at a minimum, the total quantity of No. 4 fuel oil used (including the fuel oil analyses from the vendor(s)) and the total throughput of billet tons of steel.
16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).


PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

17. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-2.220).

Issued this 1 day  
of September, 1992  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Howard L. Rhodes  
Director  
Division of Air Resources  
Management



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Florida Steel Corporation  
P. O. Box 518  
Baldwin, Florida 32234

**Permit Number:** AC 16-193734  
**Expiration Date:** May 31, 1993  
**County:** Duval  
**Latitude/Longitude:** 30°16'53"N  
81°58'50"W  
**Project:** Electric Arc Furnace and  
Associated Baghouse Control  
Systems

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the revision of the originally estimated potential emissions of some PSD-tracked pollutants that were subject to a one-time test requirement (conducted February 13, 1992) and established in the construction permit issued June 28, 1991 [AC 16-193734: electric arc furnace (EAF) and associated baghouse control systems (Nos. 1-2, 3 & 4)]. The EAF will have maximum total process input and product rates of 145,262 lbs/hr raw material and 65 billet tons/hr steel, respectively. The EAF is fired on natural gas. The baghouse control systems have a combined average flow rate of 532,268 dscfm; also, the baghouses have a design efficiency of +99% for particulate matter (PM/PM<sub>10</sub>) of submicron size. The project will occur at the permittee's facility located at 7973 Rebar Road in Baldwin, Duval County, Florida. The UTM coordinates are Zone 17, 405.7 km East and 3350.2 km North.

The Standard Classification Codes are: Steel Production - 3312

o EAF: stack	3-03-009-04	Tons Produced
o EAF: charging	3-03-009-06	Tons Produced
o EAF: tapping	3-03-009-07	Tons Produced

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments, drawings, and supplementary information, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received March 12, 1991.

**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193734**  
**Expiration Date: May 31, 1993**

**Attachments cont.:**

2. Technical Evaluation and Preliminary Determination dated May 22, 1991.
3. Construction Permit No. AC 16-193734 signed June 28, 1991.
4. Mr. James S. Alves' letter with enclosure (02/13/92 test report) received March 27, 1992.
5. Intent to Issue package, which includes a revised construction permit (AC 16-193734), dated July 17, 1992.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department



**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193734**  
**Expiration Date: May 31, 1993**

**GENERAL CONDITIONS:**

as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

(x) Compliance with Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart AA.

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The Electric Arc Furnace (EAF) is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).

2. The EAF is permitted to operate a maximum of 7872 hrs/yr.

3. The maximum total process input rates of raw materials are 145,262 lbs/hr and 483,705 TPY. The maximum product rates of billet steel are 65 tons/hr and 440,172 TPY.

4. From the baghouse control systems (Nos. 1-2, 3 & 4), the total pollutant emissions shall not exceed the following:

o PM/PM<sub>10</sub>: 21.8 lbs/hr; 85.8 TPY

Note: Pollutant emissions are based on:

a. Hourly

o PM/PM<sub>10</sub>: Permittee's request pursuant to F.A.C. Rule 17-2.510(2)(d)5.

b. Annual

o PM/PM<sub>10</sub>: 7872 hrs/yr operation.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

5. For PSD tracking purposes, the estimated/calculated total potential/actual pollutant emissions from the baghouse control systems (Nos. 1-2, 3 & 4) are:

- o SO<sub>2</sub>: 20.0 lbs/hr; 67.8 TPY
- o CO: 167.4 lbs/hr; 658.9 TPY
- o NOx: 18.0 lbs/hr; 70.8 TPY

Note: Pollutant emissions are based on:

a. Hourly

- o SO<sub>2</sub>: 65 bTPH steel product rate (AP-42 Emission Factors).
- o CO: 2/13/92 pollutant test results.
- o NOx: 2/13/92 pollutant test results.

b. Annual

- o SO<sub>2</sub>: 440,172 bTPY steel product rate.
- o CO: 7872 hrs/yr operation.
- o NOx: 7872 hrs/yr operation.

6. Visible emissions (VE) shall not exceed the following:

- o 3% opacity from the baghouse control systems (Nos. 1-2, 3 & 4);
- o From the shop roof:
  - o 20% opacity during charging; and,
  - o 40% opacity during tapping.

7. For testing purposes and NSPS applicability purposes, the maximum product rate of the EAF is 65 bTPH steel. For PSD purposes, the maximum product rate of the EAF will be 440,172 bTPY steel.

8. Test methods and procedures shall be in accordance with 40 CFR 60.275 and 40 CFR 60, Appendix A (July, 1991 version), and F.A.C. Rule 17-2.700:

- a. The initial and subsequent compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively (40 CFR 60, Appendix A). The compliance tests shall be conducted concurrently, unless inclement weather interferes.
- b. Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).

9. Emission monitoring shall be in accordance with 40 CFR 60.273, which includes the requirement for the installation, calibration, maintenance, and operation of a continuous monitoring system for the measurement of the opacity of emissions into the atmosphere.

**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193734**  
**Expiration Date: May 31, 1993**

**SPECIFIC CONDITIONS:**

10. Monitoring of emissions shall be in accordance with 40 CFR 60.274.

11. Recording keeping and recording requirements shall be in accordance with 40 CFR 60.276.

12. For the EAF, the permittee is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.660: NSPS; 17-2.700: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operations-Problems.

13. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).

14. The Duval County Air Quality Division (DCAQD) office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2). The test report(s) shall be submitted to the DCAQD office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).

15. Any change to the EAF pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.

16. This permit supersedes all other air permits issued for the EAF.

17. An annual operation report shall be submitted to the DCAQD office by March 1 of each calendar year reporting, at a minimum, the annual quantity of natural gas fired and the billet tons of steel produced.

18. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

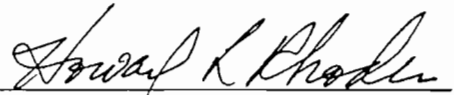
19. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-2.220).

PERMITTEE:  
Florida Steel Corporation

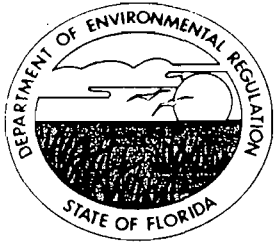
Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

Issued this 1 day  
of September, 1992  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Howard L. Rhodes  
Director  
Division of Air Resources  
Management

ATTACHMENTS AVAILABLE UPON REQUEST



## *Florida Department of Environmental Regulation*

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 17, 1992

### CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Alton W. Davis  
Division Manager  
Florida Steel Corporation  
Baldwin Mill Division  
7973 Rebar Road  
Post Office Box 518  
Baldwin, Florida 32234

Dear Mr. Davis:

Attached is one copy of the Department's Intent to Issue revised construction permits to reflect the results of a one-time test requirement on various PSD-tracked pollutants, because the actual emissions were higher than the projected potential emissions. The previous Department action was a modification to the existing electric arc furnace and the billet reheat furnace to allow an increase in the permitted hours of operation and the regulated pollutant emissions; and, to account for the potential emissions of the PSD-tracked pollutants (one-time test verification requirement).

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/bm

### Attachments

c: A. Kutyna, NE District  
R. Roberson, DCAQD  
R. S. Sholtes, P.E., RSS  
J. Alves, Esq., HBG&S

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permits by:

Florida Steel Corporation  
7973 Rebar Road  
Baldwin, Florida 32234

DER File Nos. AC 16-193733  
AC 16-193734

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INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue revised air construction permits (copies attached). The Department is issuing this Intent to Issue for the reasons stated below.

The applicant, Florida Steel Corporation, received air construction permits on June 28, 1991, to modify the electric arc furnace and the billet reheat furnace, which allowed an increase in the permitted hours of operation and the regulated pollutant emissions; and, to account for the potential pollutant emissions of the PSD-tracked pollutants. A one-time test verification requirement was imposed on various PSD-tracked pollutants and the results reflected that the actual emissions were higher than the projected potential emissions. Therefore, the purpose of this action is to revise the potential emissions of the PSD-tracked pollutants.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The project is not exempt from permitting procedures. The Department has determined that the issuance of revised air construction permits is necessary for federal enforceable reasons.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Revised Permits. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be the one with significant circulation in the area that may be affected by the permitting action (i.e., revision). If you are uncertain that a newspaper meets these requirements,



please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the revised permits.

The Department will issue the revised permits with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

Any person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S..

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the

right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

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C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

Copies furnished to:

A. Kutyna, NE District  
R. Roberson, DCAQD  
R. S. Sholtes, P.E., RSS  
J. Alves, Esq., HBG&S

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

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Clerk

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Date

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue revised construction permits to Florida Steel Corporation, 7973 Rebar Road, Baldwin, Duval County, Florida 32234, to reflect the results of a one-time test verification requirement on various PSD-tracked pollutants, because the actual emissions were higher than the projected potential emissions. The previous Department action was a modification to the existing electric arc furnace and the billet reheat furnace to allow an increase in the permitted hours of operation and the regulated pollutant emissions; and, to account for the potential emissions of the PSD-tracked pollutants (one-time test verification requirement). A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the requests/applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Northeast District  
7825 Baymeadows Way  
Jacksonville, Florida 32256-7577

Duval County Air Quality Division  
421 West Church Street  
Suite 412  
Jacksonville, Florida 32202-4111

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Florida Steel Corporation  
P. O. Box 518  
Baldwin, Florida 32234

**Permit Number:** AC 16-193733  
**Expiration Date:** May 31, 1993  
**County:** Duval  
**Latitude/Longitude:** 30°16'53"N  
81°58'50"W  
**Project:** Billet Reheat Furnace

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the revision of the construction permit issued June 28, 1991 [AC 16-193733: Billet Reheat Furnace (BRF)], in order to differentiate between the allowable and the PSD-tracked potential pollutant emissions established in the referenced construction permit. The BRF will be fired primarily on natural gas, but will be allowed up to 350 hrs/yr to fire No. 4 fuel oil at a maximum heat input of  $185 \times 10^6$  Btu/hr. The No. 4 fuel oil will be limited to a maximum sulfur content of 0.7%, by weight. There is no control system associated with the BRF operation. The project will occur at the permittee's facility located at 7973 Rebar Road in Baldwin, Duval County, Florida. The UTM coordinates are Zone 17, 405.7 km East and 3350.2 km North.

The Standard Classification Codes are: Steel Production - 3312

o BRF: 3-03-009-33 Tons Produced

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments, drawings, and supplementary information, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received March 12, 1991.
2. Technical Evaluation and Preliminary Determination dated May 22, 1991.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**Attachments cont.:**

3. Construction permit (AC 16-193733) issued June 28, 1991.
4. Mr. James S. Alves' letter with enclosure (02/13/92 test report) received March 27, 1992.
5. Intent to Issue package, which includes a revised construction permit (AC 16-193733), dated July 17, 1992.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.



PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The BRF is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).

2. The BRF is permitted to operate a maximum of 8300 hrs/yr.

3. The BRF is primarily fired on natural gas at a maximum heat input of  $185 \times 10^6$  Btu/hr ( $1.78 \times 10^5$  ft<sup>3</sup>); however, the BRF is permitted to fire No. 4 fuel oil at a maximum heat input of  $185 \times 10^6$  Btu/hr ( $1.25 \times 10^3$  gals/hr). The No. 4 fuel oil will be limited to a maximum sulfur content of 0.7%, by weight. The BRF is permitted to fire No. 4 fuel oil for up to 350 hrs/yr.

4. The maximum total process input and product rates are 90 billet tons per hour (bTPH) and 440,172 bTPY steel.

5. The BRF is subject to the visible emission standard of "less than 20% opacity" pursuant to F.A.C. Rule 17-2.610(2).

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

6. For PSD tracking purposes, the projected potential pollutant emissions are:

<u>Pollutant</u>	<u>Natural Gas</u>	<u>No. 4 Fuel Oil</u>
o PM/PM <sub>10</sub> :	0.3 lbs/hr; 1.2 TPY	4.9 lbs/hr; 0.9 TPY
o SO <sub>2</sub> :	0.6 lbs/hr; 2.4 TPY	76.4 lbs/hr; 13.4 TPY
o NO <sub>x</sub> :	13.8 lbs/hr; 54.9 TPY	21.6 lbs/hr; 3.8 TPY
o CO:	3.5 lbs/hr; 13.9 TPY	3.5 lbs/hr; 0.6 TPY
o HC:	0.3 lbs/hr; 1.2 TPY	0.7 lbs/hr; 0.1 TPY

Note: For the pollutant emission calculations, the permitted hours of operation are 8300 hrs/yr and based on the following:

- o Natural Gas: 7950 hrs/yr.
- o No. 4 Fuel Oil: 350 hrs/yr.
- o Maximum heat input for all fuels is  $185 \times 10^6$  Btu/hr.

7. For testing purposes and NSPS applicability purposes, the maximum product rate of the BRF is 90 bTPH steel. For PSD purposes, the maximum product rate of the BRF is 440,172 bTPY steel.

8. Test methods and procedures shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (July, 1991 version):

a. Natural Gas firing

- (1) The initial and subsequent compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively. The compliance tests shall be conducted concurrently, unless inclement weather interferes.
- (2) Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).

b. No. 4 Fuel Oil firing

- (1) For verification purposes and one-time testing requirement to establish the actual emissions/emission rate, compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively. The compliance tests shall be conducted concurrently, unless inclement weather interferes.
- (2) For verification purposes and one-time testing requirement to establish the actual emissions/emission rate(s), compliance tests for SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC shall be conducted using EPA Methods 6, 7, 10 and 25A, respectively.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

- (3) Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).
  - (4) The above compliance tests are to be conducted the next time that No. 4 fuel oil is being fired in the BRF.
9. For the BRF, the permittee is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operations-Problems.
10. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
11. The Duval County Air Quality Division (DCAQD) office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2). The test report(s) shall be submitted to the DCAQD office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).
12. Any change to the BRF pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.
13. This permit supersedes all other air permits issued for the BRF.
14. A log book shall be maintained recording, at a minimum, the date(s) and the beginning and ending "clock time(s)" of operation while firing No. 4 fuel oil.
15. An annual operation report shall be submitted to the DCAQD office by March 1 of each calendar year reporting, at a minimum, the total quantity of No. 4 fuel oil used (including the fuel oil analyses from the vendor(s)) and the total throughput of billet tons of steel.
16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193733  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

17. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-2.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1992  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

\_\_\_\_\_  
Howard L. Rhodes  
Interim Director  
Division of Air Resources  
Management



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**  
Florida Steel Corporation  
P. O. Box 518  
Baldwin, Florida 32234

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993  
County: Duval  
Latitude/Longitude: 30°16'53"N  
81°58'50"W  
Project: Electric Arc Furnace and  
Associated Baghouse Control  
Systems

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the revision of the originally estimated potential emissions of some PSD-tracked pollutants that were subject to a one-time test requirement (conducted February 13, 1992) and established in the construction permit issued June 28, 1991 [AC 16-193734: electric arc furnace (EAF) and associated baghouse control systems (Nos. 1-2, 3 & 4)]. The EAF will have maximum total process input and product rates of 145,262 lbs/hr raw material and 65 billet tons/hr steel, respectively. The EAF is fired on natural gas. The baghouse control systems have a combined average flow rate of 532,268 dscfm; also, the baghouses have a design efficiency of +99% for particulate matter (PM/PM<sub>10</sub>) of submicron size. The project will occur at the permittee's facility located at 7973 Rebar Road in Baldwin, Duval County, Florida. The UTM coordinates are Zone 17, 405.7 km East and 3350.2 km North.

The Standard Classification Codes are: Steel Production - 3312

o EAF: stack	3-03-009-04	Tons Produced
o EAF: charging	3-03-009-06	Tons Produced
o EAF: tapping	3-03-009-07	Tons Produced

The source shall be constructed/modified in accordance with the permit application, plans, documents, amendments, drawings, and supplementary information, except as otherwise noted in the General and Specific Conditions.

Attachments to be Incorporated:

1. Application to Construct Air Pollution Sources, DER Form 17-1.202(1), received March 12, 1991.

**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193734**  
**Expiration Date: May 31, 1993**

**Attachments cont.:**

2. Technical Evaluation and Preliminary Determination dated May 22, 1991.
3. Construction Permit No. AC 16-193734 signed June 28, 1991.
4. Mr. James S. Alves' letter with enclosure (02/13/92 test report) received March 27, 1992.
5. Intent to Issue package, which includes a revised construction permit (AC 16-193734), dated July 17, 1992.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

(x) Compliance with Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart AA.

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.



PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**GENERAL CONDITIONS:**

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The EAF is subject to all applicable provisions of F.A.C. Chapters 17-2 and 17-4 and 40 CFR (July, 1991 version).

2. The EAF is permitted to operate a maximum of 7872 hrs/yr..

3. The maximum total process input rates of raw materials are 145,262 lbs/hr and 483,705 TPY. The maximum product rates of billet steel are 65 tons/hr and 440,172 TPY.

4. From the baghouse control systems (Nos. 1-2, 3 & 4), the total pollutant emissions shall not exceed the following:

o PM/PM<sub>10</sub>: 21.8 lbs/hr; 85.8 TPY

Note: Pollutant emissions are based on:

a. Hourly

o PM/PM<sub>10</sub>: Permittee's request pursuant to F.A.C. Rule 17-2.510(2)(d)5.

b. Annual

o PM/PM<sub>10</sub>: 7872 hrs/yr operation.

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

**SPECIFIC CONDITIONS:**

5. For PSD tracking purposes, the estimated/calculated total potential/actual pollutant emissions from the baghouse control systems (Nos. 1-2, 3 & 4) are:

- o SO<sub>2</sub>: 20.0 lbs/hr; 67.8 TPY
- o CO: 167.4 lbs/hr; 658.9 TPY
- o NOx: 18.0 lbs/hr; 70.8 TPY

Note: Pollutant emissions are based on:

a. Hourly

- o SO<sub>2</sub>: 65 bTPH steel product rate (AP-42 Emission Factors).
- o CO: 2/13/92 pollutant test results.
- o NOx: 2/13/92 pollutant test results.

b. Annual

- o SO<sub>2</sub>: 440,172 bTPY steel product rate.
- o CO: 7872 hrs/yr operation.
- o NOx: 7872 hrs/yr operation.

6. Visible emissions (VE) shall not exceed the following:

- o 3% opacity from the baghouse control systems (Nos. 1-2, 3 & 4);
- o From the shop roof:
  - o 20% opacity during charging; and,
  - o 40% opacity during tapping.

7. For testing purposes and NSPS applicability purposes, the maximum product rate of the EAF is 65 bTPH steel. For PSD purposes, the maximum product rate of the EAF will be 440,172 bTPY steel.

8. Test methods and procedures shall be in accordance with 40 CFR 60.275 and 40 CFR 60, Appendix A (July, 1991 version), and F.A.C. Rule 17-2.700:

a. The initial and subsequent compliance tests for particulate matter (PM/PM<sub>10</sub>) emissions and VE shall be conducted using EPA Methods 5 and 9, respectively (40 CFR 60, Appendix A). The compliance tests shall be conducted concurrently, unless inclement weather interferes.

b. Other test methods may be used only if prior Departmental approval has been granted in writing pursuant to F.A.C. Rule 17-2.700(3).

9. Emission monitoring shall be in accordance with 40 CFR 60.273, which includes the requirement for the installation, calibration, maintenance, and operation of a continuous monitoring system for the measurement of the opacity of emissions into the atmosphere.

**PERMITTEE:**  
**Florida Steel Corporation**

**Permit Number: AC 16-193734**  
**Expiration Date: May 31, 1993**

**SPECIFIC CONDITIONS:**

10. Monitoring of emissions shall be in accordance with 40 CFR 60.274.
11. Recording keeping and recording requirements shall be in accordance with 40 CFR 60.276.
12. For the EAF, the permittee is subject to all applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.660: NSPS; 17-2.700: Stationary Point Source Emission Test Procedures; and, 17-4.130: Plant Operations-Problems.
13. Objectionable odors shall not be allowed off plant property in accordance with F.A.C. Rule 17-2.620(2).
14. The Duval County Air Quality Division (DCAQD) office shall be notified in writing at least 15 days prior to compliance testing in accordance with F.A.C. Rule 17-2.700(2). The test report(s) shall be submitted to the DCAQD office no later than 45 days after the last sampling run of each test is completed in accordance with F.A.C. Rule 17-2.700(7).
15. Any change to the EAF pursuant to F.A.C. Rule 17-2.100, Definitions-Modification, the permittee shall submit an application and the appropriate processing fee to the Department's Bureau of Air Regulation office.
16. This permit supersedes all other air permits issued for the EAF.
17. An annual operation report shall be submitted to the DCAQD office by March 1 of each calendar year reporting, at a minimum, the annual quantity of natural gas fired and the billet tons of steel product.
18. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).
19. An application for an operation permit must be submitted to the Department's Northeast District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed while noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-2.220).

PERMITTEE:  
Florida Steel Corporation

Permit Number: AC 16-193734  
Expiration Date: May 31, 1993

SPECIFIC CONDITIONS:

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1992  
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

---

Howard L. Rhodes  
Interim Director  
Division of Air Resources  
Management



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 21, 1992

## CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Alton W. Davis  
Division Manager  
Florida Steel Corporation  
7973 Rebar Road  
Post Office Box 518  
Baldwin, Florida 32234

Dear Mr. Davis:

Re: Amendment to Construction Permit-Expiration Date Extension  
AC 16-193733: Billet Reheat Furnace

The Department has reviewed the above request contained in Mr. James S. Alves' letter received May 6, 1992. The request is acceptable and the following will be changed and added:

### 1. Expiration Date

From: May 31, 1992  
To: May 31, 1993

### 2. Attachment to be Incorporated

o Mr. James S. Alves' letter received May 6, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Mr. Alton W. Davis  
Page 2

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the construction permit, No. AC 16-193733, and shall become a part of the permit.

Sincerely,



for Steve Smallwood, P.E.  
Director  
Division of Air Resources  
Management

Mr. Alton W. Davis  
Page 3

SS/BM/rbm

Attachment

cc: A. Kutyna, NED  
R. Roberson, DCAQD  
J. Harper, EPA  
R. Sholtes, P.E., RSS  
G. Smallridge, Esq., DER  
B. Congdon, Esq., DER  
J. Alves, Esq., HBG&S

Attachment



HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

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LAURA BOYD PEARCE  
GARY V. PERKO  
MICHAEL P. PETROVICH  
DOUGLAS S. ROBERTS  
JULIE B. ROME  
KRISTIN C. RUBIN  
CECELIA C. SMITH

OF COUNSEL  
W. ROBERT FOXES

CARLOS ALVAREZ  
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BRIAN H. BIBEAU  
KATHLEEN BLIZZARD  
ELIZABETH C. BOWMAN  
WILLIAM L. BOYD, IV  
RICHARD S. BRIGHTMAN  
PETER C. CUNNINGHAM  
THOMAS M. DE ROSE  
WILLIAM H. GREEN  
WADE L. HOPPING  
FRANK E. MATTHEWS  
RICHARD D. MELSON  
WILLIAM D. PRESTON  
CAROLYN S. RAEPPEL  
GARY P. SAMS  
ROBERT P. SMITH  
CHERYL G. STUART

May 6, 1992

RECEIVED

MAY 06 1992

Division of Air  
Resources Management

Mr. Clair E. Fancy, P.E., Chief  
c/o Bruce Mitchell, P.E.  
Bureau of Air Regulation  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road, Room 206F  
Tallahassee, FL 32399-2400

Re: Application to Extend Construction Permit  
Florida Steel Corporation  
Permit No. AC 16-193733  
Duval County

Dear Clair:

Please accept this letter as an application, pursuant to Rule 17-4.080(3), Fla. Admin. Code, to extend the expiration date of Air Construction Permit No. AC 16-193733, which governs the billet rehear furnace (BRF) at Florida Steel's Baldwin Mill in Duval County. The current expiration date is May 31, 1992; Florida Steel requests that this date be extended to May 31, 1993. Pursuant to Rule 17-4.050(4)(o), Fla. Admin. Code, an application fee of \$50.00 is enclosed.

As you may recall, the Department previously extended until May 31, 1993 the expiration date for a parallel permit for the electric arc furnace (EAF) at the Baldwin Mill. We are submitting this request so that the permits for both sources may remain on parallel tracks. This will result in greater efficiency for the Department and Florida Steel.


Of course, we are comfortable that Florida Steel can demonstrate reasonable assurances of compliance with applicable standards.

Thank you.

Sincerely,

HOPPING BOYD GREEN & SAMS

By:

  
James S. Alves  
Gary V. Perko

Best Available Copy

Mr. Clair E. Fancy  
May 6, 1992  
Page 2

/kkm:FLSTEapp

Enclosure

cc: Steven Dow, Esquire

*A. Katyma, DE Dist*

*R. Rollerson, DC AGD*



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 31, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Alton W. Davis  
Division Manager  
Florida Steel Corporation  
7973 Rebar Road  
Post Office Box 518  
Baldwin, Florida 32234

Dear Mr. Davis:

Re: Amendment to Construction Permit-Expiration Date Extension  
AC 16-193734: Electric Arc Furnace

The Department has reviewed the above request contained in Mr. James S. Alves' letter received February 18, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date

From: May 31, 1992  
To: May 31, 1993

2. Attachment to be Incorporated

o Mr. James S. Alves' letter received February 18, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Mr. Alton W. Davis  
Page 2

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

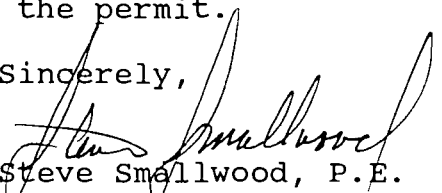
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the construction permit, No. AC 16-193734, and shall become a part of the permit.

Sincerely,



Steve Smallwood, P.E.

Director

Division of Air Resources  
Management

Mr. Alton W. Davis  
Page 3

SS/BM/rbm

Attachment

cc: A. Kutyna, NED  
R. Roberson, DCAQD  
J. Harper, EPA  
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W. ROBERT FOKES

February 18, 1992

RECEIVED  
FEB 18 1992  
Division of Air  
Resources Management

Mr. Clair E. Fancy, P.E., Chief  
Bureau of Air Regulation  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road, Room 206F  
Tallahassee, FL 32399-2400

Re: Application to Extend Construction Permit  
Florida Steel Corporation  
Permit No. AC 16-193734  
Duval County

Dear Clair:

Please accept this letter as an application, pursuant to Rule 17-4.080(3), Fla. Admin. Code, to extend the expiration date of Air Construction Permit No. AC 16-193734, which governs the electric arc furnace (EAF) at Florida Steel's Baldwin Mill in Duval County. The current expiration date is May 31, 1992; Florida Steel requests that this date be extended to September 30, 1992. Pursuant to Rule 17-4.050(4)(o), Fla. Admin. Code, an application fee of \$50.00 is enclosed.

As you may recall, the Department issued Permit No. AC 16-193734 on June 28, 1991. Although Florida Steel did not modify the Baldwin Mill EAF or in any manner change its operations, the Department determined that issuance of a new construction permit was the most appropriate regulatory mechanism for adjusting conditions relating to the Baldwin Mill hours of operation, production rate, and particulate matter emissions. Longstanding permit conditions relating to emissions of NO<sub>x</sub> and CO from the Baldwin Mill were carried over from previous permits without any discussion or consideration. The emission limitations for NO<sub>x</sub> (1.1 lbs/hr., 3.7 TPY) and CO (58.5 lbs/hr, 198.3 TPY) were first set in 1982. However, the new (1991) air construction permit required, for the first time, a "one time test" for NO<sub>x</sub> and CO "for verification purposes."

Florida Steel is requesting this extension of time because recently we have discovered new information indicating that the permitting assumptions that resulted in the Baldwin Mill's NO<sub>x</sub> and CO emission limitations may be obsolete. More specifically,

Mr. Clair E. Fancy  
February 18, 1992  
Page 2

we are aware of a steel mill in Indiana that recently tested for NO<sub>x</sub> and CO and recorded levels substantially higher than its permitted limits. In studying documentation concerning that steel mill's experience, researching additional available information, and in reviewing the permitting history of the Baldwin Mill, we are concerned that the NO<sub>x</sub> and CO limits in the Baldwin Mill construction permit may require adjustment.


We are requesting this extension of time so that Florida Steel may have the opportunity to discuss this matter with the Department and request such substantive changes to the air construction permit as may be necessary and acceptable to the Department. Florida Steel is mindful of its obligation to apply for an air operation permit within 90 days of expiration of the construction permit. In this regard, an extension of the EAF construction permit is appropriate because it would provide an opportunity to resolve apparent NO<sub>x</sub> and CO issues prior to submission of an application for an operation permit. Last week, Florida Steel performed the "verification" compliance test contemplated under Specific Condition No. 7 of its construction permit; the results are not yet available.

We have provided a copy of this letter to Mr. Bruce Mitchell because he has been the primary permit writer for Florida Steel. We will contact Mr. Mitchell in the near future and attempt to set up a meeting to discuss the issues addressed in this letter, and review the available data. I hope that you and Mr. Mitchell are assured that Florida Steel takes its environmental obligations seriously, and is committed to complying with all standards required by applicable regulations.

Sincerely,

HOPPING BOYD GREEN & SAMS

By:

  
James S. Alves  
Gary V. Perko

/kkm:FLSTEapp  
cc: Bruce Mitchell  
Gary Smallridge, Esquire

*G. K. Smallridge*  
*R. Robinson*

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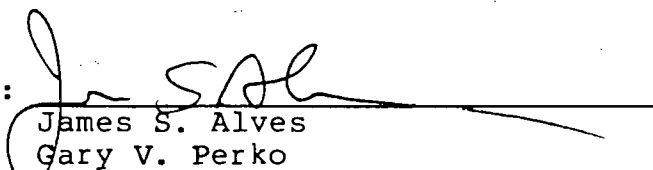
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