



**Colorado Department
of Public Health
and Environment**

OPERATING PERMIT

**CF&I Steel, L.P. dba EVRAZ Rocky Mountain Steel (ERMS)
Steelmaking**

First Issued: December 1, 2001

Renewed: December 28, 2010

10.19 (Paragraph 51) As needed per engineering evaluation and design considerations and per review by EPA, RMSM shall upgrade all fans and baghouses to be installed for the new EAF to ensure continuing compliance with the requirements of Paragraph 33 [of the Decree].

10.19.1 Note: The upgraded fans and baghouses were installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.24.

10.20 (Paragraph 53) RMSM shall confine its slag loading to inside the EAF building, minimizing emissions to the atmosphere to the greatest extent practicable.

10.20.1 Note: The slag loading building confinement was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.24.

10.21 (Paragraph 54) O&M services provided by and under supervision of Serbaco shall continue to be provided by Serbaco or other qualified contractor(s).

10.21.1 Note: Requirements are included in Section II, Condition 1.17.

10.22 (Paragraph 55) NO_x AND CO CONTROLS ON EAFs – AN INNOVATIVE CONTROL PROJECT

10.22.1 RMSM will install NO_x, CO, and O₂ analyzers along with associated sample collection probes, sample conditioning equipment, and data handling and collection equipment to gather NO_x and CO concentration data at the exit of current Baghouse #3.

10.22.2 RMSM will install the necessary equipment to allow the EAF furnace operator to be able to monitor the NO_x, CO, and O₂ signals referenced in (a) above in the EAF furnace pulpit. This equipment will include appropriate signal transmission and display equipment including controllers and a display computer.

10.22.3 RMSM will rely on the emission signals generated by this new monitoring equipment to reduce NO_x and CO emissions from EAF#3 to the maximum extent practicable through implementing and synchronizing improvements to its current operational practices.

10.22.4 Once the new pulpit is installed for the modernized EAF, this new instrumentation will be relocated to the modernized EAF's furnace pulpit.

10.22.5 Note: The NO_x and CO monitoring systems were installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.24.

PARAMETRIC MONITORING REQUIREMENTS FOR THE EAFs, LADLE METALLURGICAL FURNACE (LMF), RAIL AND ROD/BAR REHEAT FURNACES AND ASSOCIATED CONTROL EQUIPMENT

- f. Excess Emission and Monitoring System Performance Reports shall be submitted as required under § 60.7.
- g. Performance tests shall be conducted as required under § 60.8.
- h. Compliance with opacity standards shall be demonstrated according to § 60.11.
- i. Continuous monitoring systems shall be maintained and operated as required under § 60.13.

1.15 Except as provided in Condition 1.16 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever compliance with the opacity requirements of Condition 1.13 is demonstrated.

1.16 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed whenever compliance with the opacity requirements of Condition 1.13 is demonstrated.

1.17 The permittee shall retain a dedicated, third party maintenance contractor to perform monitoring, inspection and maintenance activities on the baghouses and associated equipment. At a minimum, one representative of the maintenance contractor shall be on-site at all times while the EAF is operating. The contractor's monitoring, inspection and maintenance procedures, and schedules shall be maintained and made available to the Division upon request. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.18 Stack testing for particulate matter emissions (SRC 1 & SRC 3), VOC (SRC 1 & SRC 3), Lead (SRC 1 & SRC 3), SO₂ (SRC 1 & SRC 3), HF (SRC 1 & SRC 3), and NO_x (SRC 1) shall be performed on the EAF using EPA approved methods within 180 days of renewal permit issuance [December 28, 2010] to monitor compliance with the annual and BACT emission limitations of this permit.

Rec'd
U.S. DISTRICT COURT
DISTRICT OF COLORADO

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

JAMES R. HANSPEAKER
CLERK

Civil Action No. **03-m-0608**

BY _____ DEP. CLK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
CF&I STEEL, L.P.,)
d/b/a ROCKY MOUNTAIN STEEL MILLS,)
)
Defendant.)
_____)

FILED
UNITED STATES DISTRICT COURT
NOV 26 2003
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CONSENT DECREE

52. RMSM shall provide EPA with a certification by its design engineers of the engineers' belief that the requirements of Paragraph 33 will be met by the equipment that will be used in the fume capture and collection system. If the engineering firm finds that any portion of this equipment is not properly designed, in good condition and serviceable, then RMSM will replace that portion with brand new, properly designed equipment.

53. Beginning no later than thirty days after EAF #3 is shut down, RMSM shall confine its slag loading to inside the EAF building, minimizing emissions to the atmosphere to the greatest extent practicable.

54. O & M services provided by and under supervision of Serbaco shall continue to be provided by Serbaco or other qualified contractor(s).

VII. NO_x AND CO CONTROLS ON EAFs—AN INNOVATIVE CONTROL PROJECT

55. a. By March 15, 2003, RMSM will install NO_x, CO, and O₂ analyzers along with associated sample collection probes, sample conditioning equipment, and data handling and collection equipment to gather NO_x and CO concentration data at the exit of current Baghouse #3.

b. By May 15, 2003, RMSM will install the necessary equipment to allow the EAF furnace operator to be able to monitor the NO_x, CO, and O₂ signals referenced in (a) above in the EAF #3 furnace pulpit. This equipment will include appropriate signal transmission and display equipment including controllers and a display computer.

c. RMSM will rely on the emission signals generated by this new monitoring equipment to reduce NO_x and CO emissions from EAF #3 to the maximum extent practicable through implementing and synchronizing improvements to its current operational practices.

d. Once the new pulpit is installed for the modernized EAF #4, this new instrumentation will be relocated to the modernized EAF's furnace pulpit.