

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE DIRECTOR

)
In the matter of administrative proceedings)
involving the **MCLOUTH STEEL COMPANY,**)
TRENTON PLANT, a corporation organized)
under the laws of the State of Michigan and)
doing business at 1491 West Jefferson)
Avenue in the City of Trenton, County of)
Wayne, State of Michigan.)
_____)

SIP No. 23-1993
Revised: 9/9/94

STIPULATION FOR ENTRY OF FINAL ORDER
BY
CONSENT

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 et seq., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate a portion of Wayne County as non-attainment for PM-10 (particulate matter less than 10 micrometers) and require a State Implementation Plan ("SIP"), based on legally enforceable control measures, that provides for a demonstration of attainment and maintenance of the primary National Ambient Air Quality Standard ("NAAQS") for PM-10 in Wayne County. Further, pursuant to Section 15 of the Michigan Air Pollution Act, 1965 PA 348, as amended ("Act 348"), companies in the standard industrial classifications listed in 15(1), and which are located in areas listed in Table 36 of R 336.1371 of the Michigan administrative code, are required to develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order or as part of an approved permit to install or operate.

The McLouth Steel Company ("Company") owns and operates the McLouth Steel Trenton Plant ("Plant"), which is a steel manufacturing facility, located at 1491 West Jefferson Avenue, City of Trenton, County of Wayne, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plant is a significant source of fugitive and particulate dust emissions which contribute to the non-attainment problem. Further, the requirements for the control of fugitive dust, set forth in Section 15 of Act 348, apply to the Plant.

The Company and the MDNR stipulate as follows:

1. The Air Pollution Act, 1965 PA 348, as amended, ("Act 348"), MCL 336.11 et seq; MSA 14.58(1) et seq is an act to control air pollution in this state.
2. The Director of the MDNR ("Director") is authorized pursuant to Section 5 of Act 348 to administer and enforce all provisions of Act 348.
3. The Director has delegated authority to the Air Quality Division ("AQD Chief") to enter into the Consent Order.
4. The resolution of this matter by a Consent Order pursuant to Section 16c of Act 348 is proper and acceptable.
5. This Consent Order becomes effective on the date of execution ("effective date of this Consent Order") by the AQD Chief.
6. The emissions of fugitive dust from the Plant are subject to the opacity limitations and prohibitions contained in Sections 15 and 15a of Act 348. The particulate matter and fugitive dust emissions from the Plant must not cause or contribute to a violation of the PM-10 NAAQS. Further, the CAA and Act 348 require the application of all reasonably available control measures ("RACM") for the control of PM-10 emissions.

7. This Consent Order is designed to ensure attainment and maintenance of the PM-10 NAAQS, compliance with Sections 15 and 15a of Act 348, and compliance with the RACM requirements of the CAA and Act 348.

COMPLIANCE PROGRAM AND EMISSION LIMITATIONS

8. On and after the effective date of this Consent Order, the Company shall fully comply with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, and the particulate emission control program, which are attached as Exhibits A and B, respectively, incorporated by reference, and made an enforceable part of this Consent Order.

RECORDKEEPING AND REPORTING

9. On and after the effective date of this Consent Order, the Company shall keep records as specified in Exhibit A and Exhibit B.

10. On and after October the effective date of this Consent Order, the records required pursuant to this Consent Order shall be kept on file at the Company for a period of at least two (2) years, and shall be made available to MDNR upon written or verbal request.

11. Beginning with the calendar quarter starting after the effective date of this Consent Order, and quarterly thereafter, the Company shall submit to MDNR a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in Exhibits A or B, was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be

submitted within 30 days following the end of the calendar quarter in which the data were collected.

GENERAL PROVISIONS

12. Upon entry, this Consent Order, along with other supporting documentation required by the United States Environmental Protection Agency ("U.S.EPA"), shall be submitted to the U.S.EPA for approval as a revision to the Michigan SIP in accordance with Part D, Section 171 et seq., of the Federal Clean Air Act, as amended by Section 105 of the Clean Air Act Amendments of 1990. This Consent Order shall become effective immediately upon entry, except that this Consent Order shall have no effect on the federally-approved SIP unless and until the submitted SIP revision request is formally approved by the U.S.EPA.

13. Upon entry of this Consent Order, the Company may change it's processes, modify the fugitive dust control program contained in Exhibit A, or modify the particulate emission control program contained in Exhibit B ("Control Programs"), in accordance with the following:

A. Process Change

(1) The Company may change it's operations or processes which are sources of particulate and fugitive dust provided all of the following conditions are met:

(a) The provisions of the Control Programs continue to apply to the subject operation or process;

(b) The change does not result in an increase in the level of fugitive dust or particulate emissions;

(c) The change is approved.

- (2) The Company shall submit to MDNR a written description of the proposed change and how it meets the requirements of 13(A)(1).
- (3) The MDNR shall approve or disapprove the proposed change, in writing, within 45 days from receiving a proposed change which meets the requirements of 13(A)(1).
- (4) Should the MDNR disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

B. Control Program Revision

- (1) The Company may revise the Control Programs provided both of the following conditions are met:
 - (a) The Company demonstrates*, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDNR for approval.
 - (b) The revision is approved.
- (2) The MDNR shall approve or disapprove the proposed revision, in writing, within 45 days from receiving a proposed revision using an applicable U.S.EPA approved method to demonstrate the proposed revision meets the requirements of 13(B)(1).
- (3) Should the MDNR disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

C. U.S.EPA Notification

Upon approval of a change pursuant to subsection A above, or a substitution of a control measure pursuant to subsection B above, MDNR shall notify U.S.EPA, in writing, of the revised provisions which are enforceable for the facility.

D. Minor Modification

Upon adoption by the MDNR, and upon approval by U.S.EPA, of operating permit rules to implement the Permit Modification provisions recited at 40 CFR 70.7 (e), the Company may modify a fugitive dust or particulate emission source referred to in this Consent Order according to the terms and conditions contained in the operating permit rules.

E. Minor Modification Approval

Upon MDNR approval of a minor modification pursuant to subsection D above, the MDNR shall submit the approved minor modification to U.S.EPA as a proposed revision to the Michigan SIP.

F. Other Applicable Requirements

Any process change, control program revision, or minor modification made pursuant to this Paragraph does not affect the company's obligation to obtain a permit to install or operate required by Federal law or regulation, or contained in Part 2 of the Air Pollution Control ("APC") Rules and any other applicable requirement contained in the APC Rules or Act 348.

* - Demonstrations made pursuant to 13(B)(1)(a) involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided for by the applicable U.S.EPA approved SIP or U.S.EPA approved method.

14. This abatement program is not a variance subject to the 12 month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

15. The provisions of this Consent Order shall be binding on the parties to this action, their officers, servants, employees, and attorneys, and on those persons in active concert or participation with them who receive actual notice of this Consent Order. In the event the McLouth Steel Company sells or transfers the Trenton Plant, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the McLouth Steel Company shall also notify MDNR Staff, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser or transferee. The purchaser must provide written agreement, to the Company, to assume the compliance responsibilities of the Consent Order and provide a copy of the agreement to the MDNR Staff.

16. Pursuant to the requirement in Section 5h of Act 348, the public was notified of a 30-day public comment period on this Consent Order which began on March 1, 1993 and a public hearing on this Consent Order which was held on March 30, 1993.

17. Section 16e of Act 348 may serve as a source of authority but not a limitation under which this Consent Order may be enforced. Further, the Michigan

Environmental Protection Act ("MEPA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq; and all other applicable laws may be used to enforce this Consent Order.

I, the undersigned, who is signing this Stipulation and Order for the Company, certify that I am fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

Approved as to Form and Content:

MCLOUTH STEEL COMPANY
By: *J. Corso*
Dated: *10/6/94*

The above signatory subscribed and sworn to before me this *6th* day of *October*, 1994.

Charles E. Swaney
Notary Public
CHARLES E. SWANEY
NOTARY PUBLIC-WAYNE COUNTY, MICH.
COMMISSION EXPIRES 06-09-97

Approved as to Content:

Approved as to Form:

Dennis M. Drake

James J. Stragala
for

Dennis M. Drake, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Michael Leffler
Assistant Attorney General, In Charge
NATURAL RESOURCES DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 10/12/94

Dated: 10/11/94

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Natural Resources pursuant to the provisions of the Air Pollution Control Act;

IT IS ORDERED that this Consent Order is approved and shall be entered in the record of the MDNR as a Final Order.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

By: Dennis M. Drake
Dennis M. Drake, Acting Chief
Air Quality Division

Dated: 10/12/94

EXHIBIT A
FUGITIVE DUST CONTROL PLAN
MCLOUTH STEEL COMPANY

1. Facility Name and Address:

McLouth Steel
Trenton Plant
1491 West Jefferson Avenue
Trenton, Michigan 48183

2. Name and Address of Responsible Person:

Mr. Don Windeler
Manager of Environmental Affairs
McLouth Steel, Trenton Plant
1650 West Jefferson Avenue
Trenton, Michigan 48183

Summary of Source Descriptions and Control Measures:

3. Drawing R-10000-FD (copy attached) identifies the location of the following:
- a) Approximate locations of storage piles.
 - b) All paved roads, unpaved roads, and parking areas within the facility.
4. Drawing R-10000-FD identifies the location of unloading and transporting operations with pollution control equipment.
5. Detailed description of best management practices utilized.

All areas: Prohibit road speeds exceeding 10 mph.

Paved roads:

Method A: Sweep road with vacuum sweeper with nominal 9 ft. wide sweep, water spray on or ahead of broom, water spray to control dust in chamber.

Method B: Flush road with water, using flush truck, at nominal 5 gallon/sq.ft. application rate.

Unpaved roads:

Method C: Apply dust suppressant by spray truck.

- Alternative #1: DCE 1000 diluted 7:1 with water, or with an asphalt emulsion, petroleum resin, or acrylic cement. Nominal spray boom width 8 ft. Application rate 1/2 gallon diluted solution per sq. yd.

- Alternative #2: Virgin oil, or approved re-refined oil products, by spray truck mixed 4:1 with water. Nominal spray boom width 8 ft. First application in Spring approximately 1 gallon mixture per 8 sq. yds., and subsequent applications approximately 1 gallon mixture per 10 sq. yds.

Storage piles:

Method D: DCE 1000 or an asphalt emulsion, petroleum resin, or an acrylic cement, diluted 7:1 with water. Nominal spray nozzle at 100 gpm, 1/2 gallon diluted solution applied per sq. yd.

Method E: Nalco 8897, or materials with similar functional characteristics, spray-applied at nominal rate of 0.5 gal./sq.ft.

Material transfer:

Method F: Limit loader drop height to 2 ft.

Method G: Transfer points are enclosed on three sides.

Method H: Conveyor and transfer points are enclosed on four sides.

Method I: Material is handled in enclosed containers or vehicles.

Method J: Material is consolidated by water spray. Volume and duration is regulated by control facility permit.

Conditions under which cleaning or dust suppression may be suspended:

1) Under wet weather conditions (precipitation greater than 0.1").

2) Suspend unpaved road spraying, paved road flushing and use of water-based control systems when temperatures fall below 32 degrees F.

6. The frequency of application and application rates of dust suppressants by location of materials.

Storage piles and transfer points:

<u>Material</u>	<u>Pile ID #</u>	<u>Control Method</u>	<u>Frequency</u>
Miscellaneous	B	F	
Dolomite/other	D,E	F	
Debris	F	D,F	1/mon. & opacity > 5%
Coke	G	E,F	1/year

<u>Transfer Point</u>	<u>ID #</u>	<u>Control Method</u>
Desulf Baghouse	H	I
Kish Baghouse	I	I & Wetted in Truck.
EAF Baghouse	J	I
Desulf Slag Pots	K	J

7. The frequency of treating unpaved roads, parking lots, and open areas:
 - a) Roman numerals I and V will be treated using Method C on a once every two (2) months basis.
 - b) Roman numerals II - XXI (except III, V, and VII) will be treated using Method C on a once per month basis.
 - c) Roman numerals III and VII will be treated using Method C on a once per year basis.

8. The frequency of cleaning paved traffic pattern roads and parking facilities:
 - a) ID numbers A - H & 1 - 11 will be cleaned five (5) days/week using methods A & B on an alternating basis.
 - b) ID numbers P-2 through P-6 will be cleaned using Method A once per month.

9. Other information as may be necessary to facilitate the Commission's review of the operating program:

The information in this plan (summary) is taken from the FUGITIVE DUST CONTROL PLAN prepared for MCLOUTH STEEL, dated August, 1990. The data regarding pile location, description, and size can change. Data used represents August, 1990 practice.

Emissions estimates with and without controls were calculated using the applicable estimating equation from Table A-O and emission factors provided by

Wayne County Air Pollution Control Division. The estimated emissions are based on 1985 level of operations.

10. Basis for control method selection:

Paved roads and parking lots - Vacuum sweeping with water sprays alternated with flushing was selected because it is sufficient for the dust loading present and does not entrain the dust in the air. Five days a week was selected because deliveries and shipping are not normally scheduled on weekend days.

Unpaved roads - Application of the DCE 1000, or an asphalt emulsion, petroleum resin, or an acrylic cement, or virgin oil, or approved re-refined oil products, was selected because it lasts longer than water or calcium chloride.

Storage piles - Application of the DCE 1000, or an asphalt emulsion, petroleum resin, or an acrylic cement, was selected because it is competitive with other commercial water-containing suppressants and creates a surface crust when fines are present. Where a stored material is essentially coarse, a water spray would have been considered. Application of Nalco 8897, or materials with similar functional characteristics, was selected for coke storage because it prevents freezing of the coke which allows removal of the coke in freezing weather.

Conveyors - The lime conveyor and its transfer points are enclosed for control because the material is fine and use of dust suppressants would change the required properties of the lime. The transfer points for the ore conveyor are enclosed because the materials handled tend to roll off the receiving conveyor.

(Note: See attached DNR required Recordkeeping for Fugitive Dust Sources Addendum for additional information.)

ADDENDUM

RECORDKEEPING FOR FUGITIVE DUST SOURCES

REQUIRED RECORDS

UNPAVED ROADS/LOTS

1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. NAME OF PRODUCT APPLIED
5. AMOUNT OF SOLUTION/WATER APPLIED
6. DILUTION RATIO
7. ROAD SEGMENT/LOT IDENTIFICATION

PAVED ROADS/LOTS

1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. ROAD SEGMENT/LOT IDENTIFICATION

STORAGE PILES/MATERIAL
HANDLING

1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. DILUTION RATIO (IF APPLICABLE)
5. AMOUNT OF DUST SUPPRESSANT/WATER
APPLIED
6. IDENTIFICATION OF PILE/MATERIAL
HANDLING OPERATION TREATED
7. EQUIPMENT USED

OPTIONAL RECORDS

WEATHER CONDITIONS

1. PRECIPITATION
2. TEMPERATURE
3. WIND DIRECTION AND VELOCITY

EXHIBIT B
MCLOUTH STEEL COMPANY

PARTICULATE EMISSION CONTROL PROGRAM

1. For the equipment listed in (a) and (b) below, operation during any particular calendar day shall be limited to one of the following scenarios:
 - (a) Blast Furnace No. 1 and No. 2 and neither Electric Arc Furnace No. 6 nor No. 7 and either Boiler A and any one of Boilers No. 1 through No. 5 or any three of Boilers No. 1 through No. 5 without Boiler A.
 - (b) Either Blast Furnace No. 1 or Blast Furnace No. 2 and both Electric Arc Furnace No. 6 and No. 7 and either Boiler A and any one of Boilers No. 1 through No. 5 or any three of Boilers No. 1 through No. 5 without Boiler A.

The operation of a boiler solely on blast furnace gas or natural gas during the calendar day shall not be counted in the number of boilers which operate during that calendar day.

2. The type and amount of fuel consumed by the Boilers during a particular calendar day shall be limited to either of the following scenarios:
 - (a) 98,000 gallons per day of No. 4 Fuel Oil, or
 - (b) 68,000 gallons per day of No. 6 Residual Oil
3. Records shall be kept, on a daily basis, of the parameters necessary to determine compliance with the operational limits specified in Conditions No. 1 and No. 2. These parameters shall include, but not be limited to, the following:
 - (a) Identification of each Boiler, Blast Furnace, or Electric Arc Furnace operating during each day.
 - (b) Identification of the type of oil used and the daily oil consumption for Boilers No. 1 through No. 5 and Boiler A.
4. The maximum production rate from the blast furnaces shall not exceed 5,100 tons per calendar day. Records of the amount of iron produced by the blast furnaces, on a calendar day basis, shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.
5. The maximum production rate from the basic oxygen furnaces shall not exceed 5,400 tons per calendar day. Records of the amount of steel produced by the basic oxygen furnaces, on a calendar day basis, shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.