

Statement of Basis For Title V Permit

Version 2. - 3/27/98

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| Company Name | North Star BHP Steel L. L. C. | |
| Premise Number | 03-26-00-073 | |
| Number of Non-insignificant Emissions Units | 13 | |
| What makes this facility a Title V facility? | Particulate and organic emissions in excess of the Title V significance levels | |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)? | yes | |

| Part II (State and Federally Enforceable Requirements) | | | |
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| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
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| Part III (Requirements Within the State & Federally Enforceable Section) |
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| P003 | 20% opacity | 3745-17-07(A) | n | n | y | y | y | n | n | ET: If required, the permittee will employ test Method 9, 40 CFR Part 60, Appendix A. |
| P003 | 2.2 lbs PE/hr | N | y | n | n | n | n | y | n | |
| P014 | 20% opacity | 17-07(A) | n | n | y | y | y | n | n | ET: If required, the permittee will employ test Method 9, 40 CFR Part 60, Appendix A. |
| P014 | 2.91 lbs PE/hr | n | y | n | n | n | n | n | n | ET: If required, the permittee will employ test Method 5, 40 CFR Part 60, Appendix A. |

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| P901 | <p>0.0018 grain particulate emissions (PE) /dscf (See A.I.2.d.)</p> <p>15.6 lbs PE/hr* 68.2 tons PE/yr* (See A.I.2.h.)</p> <p>8.8 lbs PE/hr (fugitive) 31.5 tons PE/yr (fugitive)</p> <p>6.7 lbs PM10/hr (fugitive) 23.9 tons PM10/yr (fugitive)</p> <p>2205.0 lbs carbon monoxide (CO)/hr* 7875.0 tons CO/yr*</p> <p>170.1 lbs nitrogen oxides (NOx)/hr* 607.5 tons NOx/yr*</p> <p>31.5 lbs sulfur dioxide (SO2)/yr* 112.5 tons SO2/yr*</p> | n | y | y | y | y | y | y | n | <p>OR -The permittee shall limit the hourly production rate to 315 tons of steel and the annual production rate to 2.25 million tons of steel per rolling, 12-month summation.</p> <p>OR- The permittee shall follow the procedures outlined in its "Scrap Management Program" in order to minimize the use of scrap that contains mercury, lead, oils, plastics, and organic materials that are charged in the EAF. The "Scrap Management Program" was reviewed and approved by the appropriate Ohio EPA District Office.</p> <p>OR- The maximum pressure in the free space inside the EAF and the control system's fan motor amperes range, when the EAF is operating in the meltdown and refining periods, shall not exceed the maximum value/range measured during the most recent emission testing that demonstrated the emissions unit was in compliance.</p> <p>ET - testing required in accordance with the following:</p> <p>PE: Methods 1 through 5 of 40 CFR, Part 60, Appendix A; NOx: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A; OC: Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A; SO2: Method 6 of 40 CFR, Part 60, Appendix A; and Hg: Method 29 of 40 CFR, Part 60, Appendix A.</p> |
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110.3 lbs organic compounds

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| P902 P903 | 0.0018 grain PE/dscf (See A.I.2.h.) 15.6 lbs PE/hr* 68.2 tons PE/yr* (See A.I.2.e.) 0.95 lb PE/hr (fugitive) 3.38 tons PE/yr (fugitive) 0.72 lb PE10/hr (fugitive) 2.57 tons PE10/yr (fugitive) 78.8 lbs CO/hr* 281.3 tons CO/yr* 4.73 lbs NOx/hr* 16.88 tons NOx/yr* 23.7 lbs SO2/hr* 84.38 tons SO2/yr* 0.31 lb Pb/hr* 1.36 tons Pb/yr* (See A.I.2.f.) 0.38 lb Hg/hr* 0.17 ton Hg/yr* | n | y | n | y | y | y | y | y | n | ET - testing required in accordance with the following: PE: Methods 1 through 5 of 40 CFR, Part 60, Appendix A; NOx: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; CO: Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A; OC: Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A; SO2: Method 6 of 40 CFR, Part 60, Appendix A; and Hg: Method 29 of 40 CFR, Part 60, Appendix A. |
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| P901 | less stringent than 31-05 | n | 40CFR Part 60, Subpart AAa. | | | | | | | |
| P902 P903 | 20% opacity | 17-07(A) | n | n | y | y | y | n | n | ET - If required, the permittee is required to employ test Method 9, 40 CFR Part 60, Appendix A. |