

Statement of Basis For Title V Permit

Company Name	Armco Inc. - Mansfield Operations	
Premise Number	03 70 01 0023	
Number of Non-insignificant Emissions Units	12	
What makes this facility a Title V facility?	CO, NOx, VOC, PM	
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)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section) Norplas

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B010 B011	20% opacity	3745-17-07	n	y	y	y	y	n	n	OR - Inherently clean E.U. burning only natural gas, monitoring, recordkeeping and reporting requirements are specified in the permit for this operational restriction. CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
B010 B011	0.02 lb PE/mmBtu	3745-17-10(B)	n	y	y	y	y	n	n	OR - Inherently clean E.U. burning only natural gas, monitoring, recordkeeping and reporting requirements are specified in the permit for this operational restriction. CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
F002	No VE's except for 6 min during 60 min.	3745-17-07 (B)(4)	n	n	y	y	y	y	n	CAM is not applicable.
F002	RACM to minimize fugitive dust	3745-17-08(B), (B)(8), (B)(9)	n	n	y	y	y	y	n	CAM is not applicable.
F002	No VE's except for 13 min during 60 min.	3745-17-07(B)(5)	n	n	y	y	y	y	n	CAM is not applicable.
F002	RACM to minimize fugitive dust	3745-17-08(B), (B)(2)	n	n	y	y	y	y	n	CAM is not applicable.
P013	20% opacity	3745-17-07	n	y	y	y	y	y	n	OR - Water supply pressure and water flow rate limit. Monitoring, recordkeeping and reporting requirements are specified for this restriction. CAM is not applicable. ET - Test required to demonstrate compliance with PE restriction.
P013	51.6 lb PE/hr	3745-17-11	n	y	y	y	y	y	n	OR - Water supply pressure and water flow rate limit. Monitoring, recordkeeping and reporting requirements are specified for this restriction. CAM is not applicable. ET - Test required to demonstrate compliance with PE restriction.

P015 P025	20% opacity	3745-17-07	n	n	y	y	y	n	n	CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
P015 P025	4.96 lb PE/hr	3745-17-11	n	n	y	y	y	y	n	CAM is not applicable. ET - Test required to demonstrate compliance with PE restriction.
P062	20% opacity	3745-17-07	n	y	y	y	y	n	n	OR - Required maintain pressure drop across control equipment. Monitoring, recordkeeping and reporting requirements are specified in the permit for this operational restriction. CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
P062	5.5 lb PE/hr	3745-17-11	n	y	y	y	y	n	n	OR - Required maintain pressure drop across control equipment. Monitoring, recordkeeping and reporting requirements are specified in the permit for this operational restriction. CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
P063	12.02 lb NOx/hr	3745-31-05	n	y	y	y	y	y	n	Basis - 3745-31-05 OR - Permitted burn only nat gas/no. 2 fuel oil. Monitoring, recordkeeping and reporting are specified. CAM not applicable.
P063	20% opacity	3745-17-07	n	y	y	y	y	n	n	OR - Permitted burn only nat gas/no. 2 fuel oil. Monitoring, recordkeeping and reporting are specified. CAM is not applicable. ET - Compliance demonstrated through operational restriction, monitoring, recordkeeping, reporting requirement.
P063	56.12 lb PE/hr	3745-17-11	n	y	y	y	y	y	n	OR - Permitted burn only nat gas/no. 2 fuel oil. Monitoring, recordkeeping and reporting are specified. CAM is not applicable.
P063	899.3 lb SO2/hr	3745-18-06(E)	n	y	y	y	y	n	n	OR - Permitted burn only nat gas/no. 2 fuel oil. CAM is not applicable.
P902 P903	12.3 lb PE/hr	3745-31-05	n	y	y	y	y	y	n	OR - Required venting to control device. Monitoring, recordkeeping and reporting are specified. Cam is not applicable.
P902 P903	86.9 lb CO/hr	3745-31-05	n	n	y	y	y	y	n	
P902 P903	891.0 tons CO/yr	n	n	n	y	y	y	y	n	
P902 P903	35.4 lb Nox/hr	3745-31-05	n	n	y	y	y	y	n	

P902 P903	362.3 tons Nox/yr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	1.6 lb SO2/hr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	11.9 tons SO2/yr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	10.9 lb VOC/hr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	130.7 tons VOC/yr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	.01 lb Pb/hr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	0.06 tons Pb/yr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	.0002 lb Hg/hr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	0.35 tons Hg/yr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	.03 lb fluoride/hr	3745- 31-05	n	n	y	y	y	y	n	
P902 P903	1.7 ton fluoride/yr	3745- 31-05	n	n	y	y	y	y	n	
P904	20% opacity	3745- 17- 07(A)	n	n	y	y	y	n	n	ET - not necessary
P904	RACM to minimize fugitive dust	3745- 17-08	n	n	y	y	y	n	n	OR - Vented to control device. Monitoring, recordkeeping and reporting are specified. CAM is not applicable. ET -
P904	4.4 lb PE/hr	3745- 17-11	n	n	y	y	y	y	n	OR - Vented to control device. Monitoring, recordkeeping and reporting are specified. CAM is not applicable. ET -
P904	20% opacity	3745- 17- 07(B)	n	n	y	y	y	n	n	ET - Not necessary

P924	20% opacity	3745-17-07	n	y	y	y	y	y	n	OR - Vented to control device. Monitoring, recordkeeping and reporting are specified. CAM is not applicable.
P924	RACM to minimize fugitive dust	3745-17-08	n	y	y	y	y	y	n	OR - Vented to control device. Monitoring, recordkeeping and reporting are specified. CAM is not applicable. ET -
P924	50.0 lb PE/hr	3745-17-11	n	y	y	y	y	y	n	OR - Vented to control device. Monitoring, recordkeeping and reporting are specified. CAM is not applicable. ET -

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For each column where “N” is specified, there should be a brief explanation in the “Comments” section. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
 3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.
- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.