

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	A K Steel Corporation	
Premise Number	1409010006	
Number of Non-insignificant Emissions Units	62	
What makes this facility a Title V facility?	Particulate, SO ₂ , NO _x and VOC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	YES	
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1			See Part II.B.1.

C 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.

C 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)

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B007- B010	20% Opacity	17- 07(A)(1)	N		N	Y			Y		Y		N	N	M. Monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.11 lb PM/MMBtu of actual heat input	17- 10(C)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	1.1 lbs SO ₂ /MMBtu of actual heat input	18- 15(C)(3)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
B021- B023 and B026	20% Opacity	17- 07(A)(1)	N		N	Y			Y		Y		N	N	M. Monitoring required to demonstrate compliance since these emissions units burn natural gas and are therefore considered an inherently clean burning fuel . R. Record keeping required to demonstrate compliance. Rp. Reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	0.02 lb PM/MMBtu of actual heat input	17-10(B)(1)	N		N	N			N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.		
B918	Charging Operations: Opacity shall not exceed 12 seconds per charge.	N	40 CFR Part 63.309(d)(2)		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Coke Oven Firing: 20% Opacity	17-07(A)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.18lbPM/MBtu	17-10(C)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	280 grains of hydrogen sulfide per 100 g/dscf of Coke Oven Gas (COG) on a monthly basis.	18-15(C)(5)	N		N	Y			Y		Y		N	N	M. Monitoring grab samples of the COG required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Offtake Piping: 3% Opacity	N	40 CFR Part 63.309(d)(1)		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Charging hole lids: 0.06% Opacity	N	40 CFR Part 63.309(d)(1)		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.

	Reasonable Available Control Technology	17-08(B)	N		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Oven doors: 5.5% Opacity	N	40 CFR Part 63.309(d)(1)		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306, of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	Y			Y		Y		N	N	M. Leak inspection program per U.S EPA Method 303, Appendix A of 40 CFR Part 63 is in place to determine compliance. R. Record keeping required per U.S EPA Method 306 of 40 CFR Part 63 is in place to determine compliance. Rp. Reporting required per U.S EPA Method 311 of 40 CFR Part 63 is in place to determine compliance. ET. No testing required to demonstrate compliance.
	Pushing Operations: 20% Opacity	17-07(B)(2)(e)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	0.03 g/dscf of PM	17-08(B)	N		Y	Y			Y		Y		Y	Y	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. Testing as outlined in Method 40 CFR Part 60, Appendix A. is required to demonstrate compliance.
	Bypass/Blower Flare: Zero% Opacity	N	40 CFR Part 63.309(h)(1)		Y	Y			Y		Y		N	N	OR. Shall maintain a net heating value content. M. Monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
F001	Zero visible emissions except for any 6-minute period	17-07(B)(4)	N		Y	Y			Y		Y		N	N	OR. Speed limits and the use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Zero visible emissions except for any 13-minute period	17-07(B)(5)	N		Y	Y			Y		Y		N	N	OR. Speed limits and the use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Recording keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y		Y		N	N	OR. Speed limits and the use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
F002	Zero visible emissions except for any 13-minute period	17-07(B)(6)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
F004-F005	20% Opacity	17-07(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	24 lbs PM/hr (Coal unloading of rotary dump of rail cars)	17-11(A)(2)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Daily monitoring of fabric filter required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	56.1 lbs PM/hr (Coal mix bins)	17-11(A)(2)	N		Y	Y			Y		Y		N	N	Should a fabric filter be utilize to control emissions, the following applies: OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Daily monitoring of fabric filter required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	9.8 lbs PM/hr (Coal screening and crushing)	17-11(A)(2)	N		Y	Y			Y		Y		N	N	Should a fabric filter be utilize to control emissions, the following applies: OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Daily monitoring of fabric filter required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

F003, F007-F010, F012 and F015	20% Opacity	17-07(B)(1)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants and enclosures used to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
F011	20% Opacity	17-07(A)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	20% Opacity	17-07(B)(1)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants and enclosures used to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.03 g/dscf PM	17-08(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants and enclosures to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	64.5 lbs PM/hr	17-11(A)(2)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Daily monitoring of fabric filter required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
F020	20% Opacity	17-07(B)(1)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants, speed limits, restrictions on the type of material handled along with controlling the drop height of the dumping of materials to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants, speed limits, restrictions on the type of material handled along with controlling the drop height of the dumping of materials to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
G001	90% Control efficiency (for submerged fill)	21-09(R)	N		Y	Y			Y		Y		Y	Y	OR. Maintain a vapor balance system to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. Testing required as outlined in OAC rule 3745-21-10, Appendix A, and OAC 3745-21-10 Appendix B to demonstrate compliance.

	95% Controlled efficiency (for recovered VOC's)	21-09(DD)	N		Y	Y			Y		Y		Y	Y	OR. Maintain a vapor balance, recovery and control system to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. Testing required as outlined in OAC rule 3745-21-10, Appendix A, and OAC 3745-21-10 Appendix B to demonstrate compliance.
K001	3 Gallons of coatings per day limitation exemption.	21-09(U)(2)(e)(ii)	N		Y	N			Y		Y		N	N	OR. Maximum daily coating usage limitation restriction. M. No monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	20% Opacity	17-07(A)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance . R. No record keeping required to demonstrate compliance. Rp. No reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.55 lbPM/hr	17-11(A)(2)	N		N	N			Y		N		N	N	M. No monitoring required to demonstrate compliance . R. No record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P009-P012	20% Opacity	17-07(A)(1)	N		N	Y			Y		Y		N	N	M. Daily visible emission readings checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings to demonstrate compliance. Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance

	63 lbs/hr PM	17-11(A)(2)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Quaterly , annual and deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	1.1 lbs SO2/MMBtu of actual heat input	18-15(C)(4)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Quaterly , annual and deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P019	20% Opacity	17-07(A)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	20% Opacity	17-07(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.55 lb PM/hr.	17-11(A)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	VOC content of all coatings shall not exceed 6.4 lbs/gallon excluding water and exempt solvents.	21-09(OO)(3)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Monthly records required that identifies the VOC content of each coating employed to demonstrate compliance. Rp. Exceedance reports required if the VOC content limitation is exceeded to demonstrate compliance. ET. No testing required to demonstrate compliance.
P022-P024	20% Opacity	17-07(A) and 17-07(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	51.93 lbs PM/hr.(P022), 65 lbs PM/hr.(P023-P024)	17-11(A)(2)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	1.1 lbs VOC/gal as applied.	21-09(OO)(2)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Daily records required that identifies the VOC content of each coating employed to demonstrate compliance. Rp. Exceedance reports required if the VOC content limitation is exceeded to demonstrate compliance. ET. No testing required to demonstrate compliance.

P043	20% Opacity	17-07(A) and 17-07(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	49.6 lbs PM/hr.	17-11(A)(2)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P047	20% Opacity	17-07(A) and 17-07(B)	N		N	Y			Y		Y		N	N	M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings to demonstrate compliance. Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance
	Reasonable Available Control Technology	17-08(B)(3)	N		Y	Y			Y		Y		N	N	OR. The use of enclosures to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	39.6 lbs PM/HR	17-11(B)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Semiannual and deviation reports required. ET. No testing required to demonstrate compliance

	2097 lbs/hr SO2	N	40 CFR Part 52.18 81(a)(1)		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P049	20% Opacity	17-07(A) and 17-07(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	N			N		N		N	N	OR. The use of enclosures to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	34.5 lbsPM/hr.	17-11(A)(2)	N		Y	Y			Y		Y		Y	Y	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Semiannual and deviation reports required. ET. Testing as outlined in Method 40 CFR Part 60, Appendix A is required to demonstrate compliance
	1.1 lbs VOC/gal as applied.	21-09(OO)(2)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Daily records required that identifies the VOC content of each coating employed to demonstrate compliance. Rp. Exceedance reports required if the VOC content limitation is exceeded to demonstrate compliance. ET. No testing required to demonstrate compliance.

P062	20% Opacity	17-07(A)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	0.01 g/dscf, 0.40 lbPM/hr and 0.01 g/dscf, 0.19 lb/hr (from the precleaner and degreaser exhaust stacks respectively) 0.006 g/dscf, 4.9 lbsPM/hr and 0.005 g/dscf, 4.0 lbs/hr (from the pickling, electrogalvanizing and dissolving station stacks respectively)	17-11(A)(2)	N		Y	Y			Y		Y		Y	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Semiannual and deviation reports required. ET. No testing is required to demonstrate compliance.

	1.1 lbs VOC/gal as applied.	21- 09(OO) (2)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Daily records required that identifies the VOC content of each coating employed to demonstrate compliance. Rp. Exceedance reports required if the VOC content limitation is exceeded to demonstrate compliance. ET. No testing required to demonstrate compliance.
P065	20% Opacity	17- 07(A)(1) , 17- 07(B)(1)	N		N	Y			Y		Y		N	N	M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings to demonstrate compliance. Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance
	74.9 lbs PM/hr	17- 11(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	2.9 lbs VOC/gal as applied.	21- 09(OO) 91)	N		N	N			Y		Y		N	N	M. No monitoring required to demonstrate compliance. R. Daily records required that identifies the VOC content of each coating employed to demonstrate compliance. Rp. Exceedance reports required if the VOC content limitation is exceeded to demonstrate compliance. ET. No testing required to demonstrate compliance.
P067	20% Opacity	17- 07(A)	N		N	Y			Y		Y		N	N	M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance

	280 grains of hydrogen sulfide per 100 g/dscf of Coke Oven Gas (COG) on a monthly basis.	18-15(C)(5)	N		N	Y			Y		N		N	N	M. Monitoring grab samples of the COG required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P068	Benzene emissions equal to or in excess of 10,000 ppm	N	40 CFR Part 61 Subpart L.		N	Y			Y		Y		N	N	M. Leak detection program required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Quarterly reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P070,P075	No detectable benzene emissions as indicated by an instrument reading less than 500 ppm of benzene.	N	40 CFR Part 61 Subpart L.		N	Y			Y		Y		N	N	M. Leak detection program required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Semi annual reports regarding leaks and an annual report required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P087-P089	20% Opacity	17-07(A)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	4.8 lbsPM/hr	17-11(A)(2)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.

P901	20% Opacity	17-07(B)(1)	N		N	N			N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.		
	Reasonable Available Control Technology and 0.03 g/dscf	17-08(B)(3)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters and enclosures required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.
P902	20% Opacity	17-07(A)(1), 17-07(B)(1)	N		N	Y			Y		Y		N	N	M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance
	Reasonable Available Control Technology	17-08(B)(3)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	72.8 lbs PM/hr	17-11(B)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing is required to demonstrate compliance.

P908	20% Opacity	17-07(A)(1), 17-07(B)(1)	N		Y	Y			Y	Y		N	N	OR. The use of dust suppressants and or enclosures to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		Y	Y			Y	Y		N	N	OR. The use of dust suppressants and or enclosures to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	50 lbs PM/hr	17-11(A)(2)	N		Y	Y			Y	Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.
	762 lbs SO2/hr	N	40 CFR 52.18 81(a)(1)		N	N			N	N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
P925	20% Opacity	17-07(A)(1)	N		N	N			N	N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	Reasonable Available Control Technology	17-08(A)(3)(b)(i)	N		Y	Y			Y		Y		N	N	OR. The use of flame suppression control system to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	73.76 lbs PM/hr	17-11(B)	N		Y	Y			Y		Y		Y	Y	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. Testing is required as outlined in Method 40 CFR Part 60, Appendix A required to demonstrate compliance
P926-P927	20% Opacity	17-07(A)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(A)(3)(b)(i)	N		Y	Y			Y		Y		N	N	OR. The use of flame suppression control system to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Combined PM emissions from P926 and P927 shall not exceed 114 lbs PM/hr	17-07(B)	N		Y	Y			Y		Y		Y	Y	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. Testing as outlined in Method 40 CFR Part 60, Appendix A is required to demonstrate compliance.

P934	20% Opacity	17-07(A)(1),17-07(B)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology and 0.03 g/dscf.	17-08(B)93)(b)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.
P935	20% Opacity	17-07(A)(1),17-07(B)(1)	N		N	Y			Y		Y		N	N	M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance
	Reasonable Available Control Technology	17-08(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	5.1 lbs PM/hr	17-11(A)(2)	N		N	N			N		N		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.

P936	20% Opacity	17-07(A)(1),17-07(B)(1)	N		Y	Y			Y		Y		N	N	OR. The use of dust suppressants and or enclosures to demonstrate compliance. M. Daily visible emission reading checks are required to demonstrate compliance. R. Record keeping required regarding the daily readings Rp. Semiannual reports required to demonstrate compliance. ET. No testing required to demonstrate compliance
	Reasonable Available Control Technology	17-08(B)	N		Y	Y			N		N		N	N	OR. The use of dust suppressants and or enclosures to demonstrate compliance. M. Periodic inspections required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No deviation reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	47.9 lbs PM/hr	17-11(A)(2)	N		Y	Y			Y		Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.
P956	20% Opacity	17-07(A)(1),17-07(B)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

	21.59 lbs PM/hr	17-11(A)(2)	N		Y	Y			Y	Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing is required to demonstrate compliance.
	1212 lbs SO2/hr.	18-06(E)(2)	N		N	N			N	N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
T002	90% Controlled efficiency (for recovered OC's)	21-07(D)(1)(b)	40 CFR Part 61 Subpart L		Y	Y			Y	Y		N	N	OR. Maintaining stated operating perimeters required to demonstrate compliance. M. Parametric monitoring required to demonstrate compliance. R. Record keeping required to demonstrate compliance. Rp. Deviation reports required. ET. No testing required to demonstrate compliance.
Z001-Z006	20% Opacity	17-07(B)(1)	N		Y	Y			Y	Y		N	N	OR. Use of natural gas as only fuel. M. Monitoring required to demonstrate compliance since these emissions units burn natural gas and are therefore considered an inherently clean burning fuel. R. Record keeping required to demonstrate compliance. Rp. Reporting required to demonstrate compliance. ET. No testing required to demonstrate compliance.
	Reasonable Available Control Technology	17-08(B)	N		N	N			N	N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.

Z015	20% Opacity	17-07(B)(1)	N		N	N			N		N		N	N	M. No monitoring required to demonstrate compliance. R. No record keeping required to demonstrate compliance. Rp. No reports required to demonstrate compliance. ET. No testing required to demonstrate compliance.
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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

C Instructions for Part III:

- C 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.
- C 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 the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. 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.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C 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.