

## Statement of Basis For Title V Permit

Company Name	Allegheny Ludlum, Inc. (New owner of plant 3 portion of Lukens, Inc.)	
Premise Number	15-76-13-1877	
Number of Non-insignificant Emissions Units	Four (4)	
What makes this facility a Title V facility?	>100 TPY NOx	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
None			

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
P043	No process weight can be determined; therefore, no applicable emission limit	17-11	N	Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas only to minimize emissions. CAM rule is not currently applicable. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P043	20 % opacity as a six-minute average	17-07(A)	N	Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas only to minimize emissions. CAM rule is not currently applicable. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P043	3.18 lbs NOx/hr	31-05	N	Y	Y	Y	Y	Y	N	OR - Permittee is limited to NG ultra-low NOx burners.
P042	20 % opacity as a six-minute average	17-07(A)	N	Y	Y	Y	Y	Y	N	OR - Pressure drop across baghouse to be maintained between 2.0 to 6.0 inches of water.
P042	0.01 gr/dscf 2.89 lbs PM/hr	31-05	N	Y	Y	Y	Y	Y	N	OR - Pressure drop across baghouse to be maintained between 2.0 to 6.0 inches of water.
P044	4.35 lbs Nox/hr	31-05	N	Y	Y	Y	Y	Y	N	OR - Supply pressure in the ammonia feed line to the SCR unit not less than 80.0 inches of water - SCR reactor unit temperature of not less than 620 degrees F - Permittee is limited to a PWR of 23.75 tons of steel per hour until emissions testing demonstrates compliance at a higher PWR. M/R - The permittee shall monitor continuously and record hourly the ammonia supply pressure and reactor unit temperature. Rp - The permittee shall submit quarterly reports which identify all periods in which the SCR parameters were not maintained at levels required.
P044	20 % opacity as a six-minute average	17- 07(A)	N	N	Y	Y	Y	Y	N	OR - No operational restrictions are necessary to show compliance. CAM rule is not currently applicable. M - The permittee shall conduct daily visible emissions (VE) checks. R - The permittee shall record the presence or absence of VE's. Rp - The permittee shall submit semiannual reports which identify days in which VE's were observed and the corrective actions were taken. ET - If required, method 9 shall be employed to demonstrate compliance with the emission limit. N - The permittee shall take corrective action in the event that VE's are observed.

P044	0.74 lb PM/hr (including nitric acid and hydrofluoric acid fumes)	31-05	N	Y	Y	Y	Y	Y	N	OR - Pressure drop across the scrubber to be maintained at a value of not to exceed 5.0 inches of water. - Scrubber water flow rate to be maintained at a value of not less than 120 gallons per minute. - Permittee is limited to a PWR of 23.75 tons of steel per hour until emissions testing demonstrates compliance at a higher PWR.
T019	None	31-05	N	Y	Y	Y	Y	N	N	OR - Pressure relief valve vented to acid fume scrubbing system being maintained with good engineering practice. M/R - Weekly check and record proper venting and water level in tank.

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 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.

**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 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 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.

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.