

Statement of Basis For Title V Permit

Company Name	LTV Steel Company, Inc. Warren Coke Plant	
Premise Number	02-78-00-0648	
Number of Non-insignificant Emissions Units	16	
What makes this facility a Title V facility?	NOx, CO, PE, SO2	
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)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B001	VE: 20 % opacity	17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Only natural gas and/or coke oven gas are permitted to be burned in the emissions unit.
B001	PE: 0.02 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	N	N	OR - Only natural gas and/or coke oven gas are permitted to be burned in the emissions unit.
B001	SO2: 0.10 lb/mm Btu	N	31-05	Y	Y	Y	Y	N	N	OR - Only natural gas and/or coke oven gas are permitted to be burned in the emissions unit. Boiler operation is limited to a total heat input of 780,000 mmBtu per year based on a rolling twelve month average.
B001	NOx: 0.10 lb/mm Btu	N	31-05	Y	Y	Y	Y	N	N	OR - Only natural gas and/or coke oven gas are permitted to be burned in the emissions unit. Boiler operation is limited to a total heat input of 780,000 mmBtu per year based on a rolling twelve month average.
B002	PE: 0.02 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B002	VE: 20 % opacity	17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B901	VE: < 12 sec/charge over 5 consecutive charges	N	40 CFR, Part 63, Subpart L [40 CFR, Part 63.304(b)(2)(iv)]	Y	Y	Y	Y	Y	N	OR - The permittee shall operate according to the work practice plan for controlling visible emissions from charging operations following the second independent exceedance of the visible emission limitation within six months for charging operations.
B901	VE: no VE from more than 2.5 % of offtake systems	N	40 CFR, Part 63, Subpart L [40 CFR, Part 63.304(b)(2)(iii)]	Y	Y	Y	Y	Y	N	OR - The permittee shall operate according to the work practice plan for controlling visible emissions from offtake systems following the second independent exceedance of the visible emission limitation within six months for offtake systems.

B901	VE: no VE from more than 0.4 % of topside lids	N	40 CFR, Part 63, Subpart L [40 CFR, Part 63.304(b)(2)(ii)]	Y	Y	Y	Y	Y	N	OR - The permittee shall operate according to the work practice plan for controlling visible emissions from topside lids following the second independent exceedance of the visible emission limitation within six months for topside lids.
B901	VE: no VE from more than 3.8 % of coke oven doors	N	40 CFR, Part 63, Subpart L [40 CFR, Part 63.304(b)(2)(i)(B)]	Y	Y	Y	Y	Y	N	OR - The permittee shall operate according to the work practice plan for controlling visible emissions from coke oven doors following the second independent exceedance of the visible emission limitation within six months for coke oven doors.
B901	PE: 0.03 lb/ton of coke pushed for > 90 % of total emissions during pushing	N	31-05	Y	Y	Y	Y	Y	N	OR - The Chemico car hot water scrubber system shall be continuously maintained at a minimum water pressure of 200 psi and a minimum water temperature of 250 degrees Fahrenheit prior to the start of the pushing operation.
B901	VE: 20 % opacity from battery top during pushing	17-07 (B) (2)(e)	N	Y	Y	Y	Y	N	N	OR - The Chemico car hot water scrubber system shall be continuously maintained at a minimum water pressure of 200 psi and a minimum water temperature of 250 degrees Fahrenheit prior to the start of the pushing operation.

B901	VE: no VE from bleeder flare except for < 5 minutes during 2 consecutive hours	N	40 CFR, Part 63, Subpart L (40 CFR, Part 63.307)	Y	Y	Y	Y	N	N	OR - The flare shall be able to control 120 % of the normal gas flow generated by the battery. The flare shall be steam-assisted and shall be designed for a net heating value of 240 Btu/scf. The flare shall be operated with a continuously operable pilot flame monitored by a thermocouple. The coke oven emissions shall not be vented to the atmosphere through the bypass bleeder stack, except through the flare.
B901	0.03 gr/dscf from the combustion stack	N	31-05	N	Y	Y	Y	Y	N	
B901	See Comments section	N	31-05	N	Y	Y	Y	Y	N	The concentration of sulfur compounds, measured as hydrogen sulfide, in the coke oven gas combusted during coke oven firing shall be less than 35 grains per 100 dscf of coke oven gas produced.
B901	VE: 20 % opacity from the combustion stack	17-07 (A)	N	N	Y	Y	Y	N	N	
B901	See Comments section	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
F001	VE: 20 % opacity from coke handling and processing	17-07 (B)(1)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

F001	See Comments section	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
F002	VE: 20 % opacity from roadways and parking areas	17-07 (B)(8)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
F002	See Comments section	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
P001	See Comments section	N	31-05	Y	Y	Y	Y	N	N	OR - The permittee shall employ and maintain a baffle system within the quench tower which shall provide coverage of not less than ninety percent of the interior cross sectional area of the tower.
P001	PE: 51.3 lbs/hr	17-11	N	Y	Y	Y	Y	N	N	OR - The total dissolved solids in the quench water applied to the coke shall not exceed 1500 mg/L as a monthly average.
P001	VE: 20 % opacity	17-07 (A)	N	Y	Y	Y	Y	N	N	OR - The permittee shall employ and maintain a baffle system within the quench tower which shall provide coverage of not less than ninety percent of the interior cross sectional area of the tower. The total dissolved solids in the quench water applied to the coke shall not exceed 1500 mg/L as a monthly average.
P002	See Comments section	N	31-05	N	Y	Y	Y	Y	N	The concentration of sulfur compounds, measured as hydrogen sulfide, in the coke oven gas combusted in this emissions unit shall be less than 35 grains per 100 dscf of coke oven gas produced.
P002	See Comments section	17-11	N	N	N	N	N	N	N	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
P002	VE: 20 % opacity	17-07 (A)	N	N	Y	Y	Y	N	N	

P801	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
P801	See Comme nts section	N	40 CFR Part 61, Subpart V	Y	Y	Y	Y	Y	N	Requirements for sampling connection system, open-ended valves or lines, equipment designated for no detectable emissions, closed vent systems, control equipment, delay of repair, alternative monitoring schedule for valves based on a skip period, and alternative monitoring for valves based on the allowable percentage of valves leaking. OR - Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; pressure relief device; recovery system for sampling connection system; open ended valve equipment; repair of equipment leak; and control systems.
P801	See Comme nts section	21-09 (DD)	N	N	Y	Y	Y	N	N	Requirements for a leak detection and repair program for the light oil recovery system in benzene service.
P802	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
P901	VE: 20 % opacity	17-07 (B)(1)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
P901	See Comme nts section	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
T001	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.

T001	VOC: 4.2 TPY	N	31-05	N	Y	Y	Y	N	N	
T002	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
T003	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
T004	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
T011	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.
T012	VOC: no detecta ble fugitive VOC emissio ns	N	40 CFR Part 61, Subpart L	N	Y	Y	Y	Y	N	Requirements for enclosing and sealing openings; positive pressure, gas blanketing control system; and pressure relief device.

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 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 comments. 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.

- 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.

