

Statement of Basis For Title V Permit

Company Name	Mingo Junction Energy Center	
Premise Number	0641090234	
What makes this facility a Title V facility?	NOX, SO2	
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.	Yes - facility on Wheeling-Pittsburgh Steel property, and produces steam and electricity solely for WPSC operations. All emission increases and operational changes are considered applicable toward WPSC projects for netting and PSD. MJEC is considered a “single facility” with WPSC for all permitting issues.	

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

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.

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

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001 B002 B003 B004	PM10 <=/= 0.0089 lb/MMBtu when burning a blend of natural gas and clean blast furnace gas, PM10 <=/= 0.006 lb/MMBtu when burning natural gas; PM10 <=/= 2.6 lbs/hr	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.
B001 B002 B003 B004	NOx <=/= 0.06 lb/MMBtu when burning a blend of natural gas and clean blast furnace gas; NOx <=/= 0.15 lb/MMBtu when burning natural gas; NOx <=/= 36.0 lbs/hr	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.

B001 B002 B003 B004	CO <=/= 0.045 lb/MMBtu when burning a blend of natural gas and clean blast furnace gas CO <=/= 0.040 lb/million Btu when burning natural gas. CO <=/= 5.3 lbs/hr.	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.
B001 B002 B003 B004	VOC <=/= 1.0 lb/hr.	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.
B001 B002 B003 B004	SO2 <=/= 45.7 lbs/hr	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.
B001 B002 B003 B004	Visible particulate emissions <=/= 20% opacity as a 6-minute average	31-05(A)(3)	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	All terms and conditions transferred from PTI #06-06309. Limits reflect BAT.

B001 B002 B003 B004	PM10 <= 11.2 tons/rolling , 12-month period; NOx <= 102.9 tons/rolling , 12-month period; CO <= 35.5 tons/rolling , 12-month period. VOC <= 2.2 tons/rolling , 12-month period; SO2 <= 200.2 tons/rolling , 12-month period.	31-05(D)	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: Units are limited to annual natural gas usage in order to ensure compliance with the tons/rolling 12-month period limits. All terms and conditions transferred from PTI #06-06309.
B001 B002 B003 B004	less stringent than OAC rule 3745-31-05(A)(3)	17-07(A)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	This limitation is less stringent than 31-05(A)(3) - BAT requires a strict 20% opacity as a six-minute average with no exceptions (17-07(A) allows one exceedance up to 60% in any hour).
B001 B002 B003 B004	less stringent than 31-05(A)(3)	17-10(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	This limitation is less stringent than 31-05(A)(3) - BAT limits PM/PM10 to a lower emission rate than 17-10 (B)(1).
B001 B002 B003 B004	less stringent than OAC rule 3745-31-05(A)(3)	40 CFR Part 60, Subpart Db	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	NSPS Db does not set forth any specific limits for a natural gas/clean BFG boiler, therefore, all limits imposed by 31-05 (A)(3) are more stringent. NSPS Db requires NOx monitoring, all M, R, Rp, and ET requirements are based on the NOx monitor requirements.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping 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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- 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. **If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.**

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.