

Statement of Basis For Title V Permit

Company Name	WCI Steel, Incorporated	
Premise Number	02-78-00-0463	
Number of Non-insignificant Emissions Units	52	
What makes this facility a Title V facility?	NO _x , CO, PE, SO ₂ , HCl, OC	
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	Y	N	OR - Only coal, natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B001	PE: 0.10 lb/mm Btu	17-10 (C)(1)	N	Y	Y	Y	Y	Y	N	OR - Only coal, natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B001	PE: 0.04 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only coal, natural gas, blast furnace 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	Y	N	OR - Only coal, natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B001	SO2: 3.9 lb/mm Btu	18-84 (J)	N	Y	Y	Y	Y	Y	N	OR - The quality of coal burned in this emissions unit shall meet the following specification on a dry basis: A sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 3.9 pounds/mmBtu actual heat input.
B002	VE: 20 % opacity	17-07 (A)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B002	PE: 0.04 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B002	PE: 0.02 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.
B002	SO2: 3.9 lb/mm Btu	18-84 (J)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or coke oven gas are permitted to be burned in the emissions unit.

B004	PE: 0.03 lb/mm Btu*	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or desulfurized coke oven gas are permitted to be burned in the emissions unit. *when burning blast furnace gas and/or blast furnace gas with other gaseous fuels
B004	PE: 0.02 lb/mm Btu*	17-10 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or desulfurized coke oven gas are permitted to be burned in the emissions unit. *when burning gaseous fuels other than blast furnace gas
B004	SO2: 0.2 lb/mm Btu	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or desulfurized coke oven gas are permitted to be burned in the emissions unit.
B004	NOx: 0.2 lb/mm Btu	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	ET - Continuous NOx emission monitoring required.
B004	VE: 20 % opacity	N	40 CFR Part 60, Subpart D	Y	Y	Y	Y	Y	N	OR - Only natural gas, blast furnace gas, and/or desulfurized coke oven gas are permitted to be burned in the emissions unit.
F001	VE: 10 % opacity from roadwa ys and parking areas	17-07 (B)(8)	N	N	Y	Y	Y	N	N	The emission limitation and rule citation reflect the settlement agreement reached between Ohio EPA and the iron and steel production facilities concerning the iron and steel facilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the limitation and rule citation was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the iron and steel production facilities have agreed to consider the emission limitation and rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the limitation and rule citation as a revision to the Ohio SIP for particulate matter.
F001	See Comme nts section	17-08 (B), (B)(8), (B)(9)	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 materia l handlin g	17-07 (B)(8) (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: 10 % opacity from storage piles	17-07 (B)(8) (d)	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.
F003	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.
F003	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.
F005	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F005	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F006	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.
F006	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.
F007	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F007	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.

F008	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F008	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F011	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.
F011	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.
F012	VE: 20 % opacity	N	31-05 (A)(3)	Y	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.
F012	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	N	N	OR - Maintain pressure drop across baghouse within the range of 3 to 7 inches while the emissions unit is in operation.
F012	PE: 0.01 gr/dscf, 0.0023 lb/ton, 2.3 tpy baghouse outlet	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - Maintain pressure drop across baghouse within the range of 3 to 7 inches while the emissions unit is in operation.
F012	PE: 32.2 tpy fugitive	N	31-05 (A)(3)	Y	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.
F012	See Comments section	N	31-05 (A)(3)	Y	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.

F012	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F012	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F012	SO2: 905.3 lbs/hr	18-06 (E)	N	N	N	N	N	Y	N	Monitoring, record keeping, and reporting is not required for the purpose of determining sulfur dioxide emissions since the emission limitation for sulfur dioxide emissions of 905.3 pounds per hour is based on the maximum process weight rate for this emissions unit.
F013	PE: 1.82 lbs/hr fugitive	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The emissions unit shall not be operated without mechanical shrouding of the steel stream (from ladle to tundish and from tundish to mold).
F013	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F013	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F014	PE: 0.5 lb/hr fugitive	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F014	VE: 20 % opacity	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F014	See Comments section	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.

F014	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F014	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F015	PE: 0.5 lb/hr fugitive	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F015	VE: 20 % opacity	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F015	See Comments section	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F015	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F015	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F020	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F020	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.

F021	PE: 4.18 tpy fugitive	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #5 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F021	VE: 10% opacity	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #5 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F021	See Comme nts section	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #5 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F021	See Comme nts section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F021	See Comme nts section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
F022	PE: 4.18 tpy fugitive	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #6 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F022	VE: 10% opacity	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #6 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F022	See Comme nts section	N	31-05 (A)(3)	N	Y	Y	Y	N	N	If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #6 and to comply with the visible emissions limitation of this permit, a slag water spray system or a water table particulate emission suppression system shall be used.
F022	See Comme nts section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. This emissions unit is not located within the areas identified in "Appendix A" of the rule.

F022	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. This emissions unit is not located within the areas identified in "Appendix A" of the rule.
G001	See Comments section	21-09 (R)	N	N	Y	Y	Y	N	N	Any gasoline dispensing facility which has an annual throughput of less than one hundred twenty thousand (120,000) gallons of gasoline is not subject to the requirements of paragraphs (R)(1) to (R)(3) of OAC rule 3745-21-09(R).
K001	VOC: 4.0 lbs VOC/gallon solids from coating	21-09 (E)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the catenary furnace at a temperature of 1240 degrees Fahrenheit when the emissions unit is in operation. The permittee shall operate the afterburners on the catenary furnace when the average temperature of the catenary furnace is more than fifty degrees Fahrenheit below 1240 degrees Fahrenheit for any three-hour period.
L025	See Comments section	21-09 (O)	N	Y	Y	Y	Y	N	N	OR - The permittee shall meet specific equipment, operational, and maintenance standards.
L025	VOC: 1.21 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall meet specific equipment, operational, and maintenance standards.
P001	SO2: 1.7 lbs/mm Btu	18-84 (I)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas, desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet in this emissions unit. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
P001	See Comments section	17-07 (A)	N	N	N	N	N	N	N	This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
P001	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	PE: 50.2 lbs/hr	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 9.75 gallons per minute at all times while the emissions unit is in operation.

P002	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 9.75 gallons per minute at all times while the emissions unit is in operation.
P002	HCl: 18 ppmv	N	40 CFR, Part 63, Subpart CCC	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 9.75 gallons per minute at all times while the emissions unit is in operation.
P003	PE: 50.2 lbs/hr	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute at all times while the emissions unit is in operation.
P003	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute at all times while the emissions unit is in operation.
P003	HCl: 18 ppmv	N	40 CFR, Part 63, Subpart CCC	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute at all times while the emissions unit is in operation.
P005	PE: 50.6 lbs/hr	17-11 (B)(1)	N	N	Y	Y	Y	N	N	The permittee shall operate the existing settling chamber when the emissions unit is in operation to adequately contain and capture particulate emissions of fugitive dust from the 54" tandem mill no. 42. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the 54" tandem mill no. 42 to the extent possible with good engineering design.
P005	VE: 20 % opacity	17-07 (A)(1)	N	N	Y	Y	Y	N	N	The permittee shall operate the existing settling chamber when the emissions unit is in operation to adequately contain and capture particulate emissions of fugitive dust from the 54" tandem mill no. 42. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the 54" tandem mill no. 42 to the extent possible with good engineering design.
P005	VE: 20 % opacity	17-07 (B)(1)	N	N	Y	Y	Y	N	N	The permittee shall operate the existing settling chamber when the emissions unit is in operation to adequately contain and capture particulate emissions of fugitive dust from the 54" tandem mill no. 42. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the 54" tandem mill no. 42 to the extent possible with good engineering design.

P005	See Comments section	17-08 (B)(3)	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.
P011	PE: 0.02 lb/mm Btu	17-10 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas to heat the continuous silicon steel processing line annealing furnace.
P011	VE: 20 % opacity	17-07 (A)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas to heat the continuous silicon steel processing line annealing furnace.
P011	See Comments section	18-06 (E)(1)	N	N	N	N	N	N	N	No process weight rate can be determined, therefore there is no applicable limit from OAC rule 3745-18-06(E)(1).
P016	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.
P016	See Comments section	17-07 (A)	N	N	N	N	N	N	N	This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
P016	SO2: 1.7 lbs/mm Btu	18-84 (I)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas, desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet in this emissions unit. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
P017	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.
P017	See Comments section	17-07 (A)	N	N	N	N	N	N	N	This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

P017	SO2: 1.7 lbs/mm Btu	18-84 (I)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas, desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of sulfur compounds less than 35 grains per 100 dry standard cubic feet in this emissions unit. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
P026	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation.
P026	See Comme nts section	17-07 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
P026	See Comme nts section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
P026	PE: 0.01 gr/dscf	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation.
P027	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation.
P027	See Comme nts section	17-07 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
P027	See Comme nts section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
P027	PE: 0.01 gr/dscf	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation.
P028	VE: 5 % opacity	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation.
P028	PE: 0.0052 gr/dscf	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouse shall be maintained within the range of 5.5 to 7.5 inches of water while the emissions unit is in operation. ET - Emission testing within 6 months of permit renewal.

P028	See Comments section	17-07 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The ladle refining process is not located within the areas identified in "Appendix A" of the rule.
P028	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The ladle refining process is not located within the areas identified in "Appendix A" of the rule.
P029	CO: 1.4 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	Stack test methods are not available to sample CO emissions after the natural gas fired flare/CO burner. Therefore, compliance with the CO emissions limitation and the requirement for 98% by weight CO emissions reduction shall be based upon the April 1996 report entitled "Dispersion Modeling Analysis of the Existing CO Flare at the WCI Steel, Inc., Plant Warren, Ohio" prepared by Environmental Quality Management, Inc.
P029	CO: 98 % reduction by weight	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	Stack test methods are not available to sample CO emissions after the natural gas fired flare/CO burner. Therefore, compliance with the CO emissions limitation and the requirement for 98% by weight CO emissions reduction shall be based upon the April 1996 report entitled "Dispersion Modeling Analysis of the Existing CO Flare at the WCI Steel, Inc., Plant Warren, Ohio" prepared by Environmental Quality Management, Inc.
P029	PE: 55.4 lbs/hr	17-11 (B)(1)	N	Y	Y	Y	Y	N	N	Daily VE monitoring and record keeping.
P029	VE: 5 % opacity	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - A pilot flame shall be maintained at all times in the flare's pilot light burner.
P029	See Comments section	17-07 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC 3745-17-08. The vacuum degassing process is not located within the areas identified in "Appendix A" of the rule.
P029	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The vacuum degassing process is not located within the areas identified in "Appendix A" of the rule.
P029	See Comments section	21-08	N	Y	Y	Y	Y	N	N	This emissions unit shall minimize carbon monoxide emissions by use of a flare. OR - A pilot flame shall be maintained at all times in the flare's pilot light burner.
P034	PE: 0.12 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.

P034	SO ₂ : 0.01 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P034	NO _x : 2.61 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P034	CO: 1.6 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P034	VOC: 0.1 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P034	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P034	See Comments section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	PE: 0.12 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	SO ₂ : 0.01 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	NO _x : 2.61 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	CO: 1.6 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	VOC: 0.1 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P035	See Comments section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.

P036	PE: 0.12 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	SO2: 0.01 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	NOx: 2.61 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	CO: 1.6 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	VOC: 0.1 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P036	See Comme nts section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to dry/preheat the ladle.
P037	PE: 0.06 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P037	SO2: 0.006 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P037	NOx: 1.30 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P037	CO: 0.78 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P037	VOC: 0.05 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P037	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.

P037	See Comments section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	PE: 0.06 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	SO2: 0.006 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	NOx: 1.30 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	CO: 0.78 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	VOC: 0.05 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P038	See Comments section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel to preheat the ladle.
P039	PE: 0.09 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P039	SO2: 0.008 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P039	NOx: 1.96 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P039	CO: 1.20 lbs/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P039	VOC: 0.08 lb/hr	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.

P039	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P039	See Comme nts section	17-08 (B)	N	Y	Y	Y	Y	N	N	OR - The permittee shall only employ natural gas as fuel for the iron ladle drying stand.
P040	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 from this emissions unit.
P040	See Comme nts section	17-08 (B)(3)	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 from this emissions unit.
P040	PE: 52.1 lbs/hr	17-11 (B)(1)	N	N	Y	Y	Y	Y	N	Daily VE monitoring and record keeping.
P901	VE: 20 % opacity from chargin g	17-07 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Operational restrictions for baghouse and scrubbers.
P901	See Comme nts section	17-08 (B)(3)	N	Y	Y	Y	Y	Y	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from blast furnace charging. The permittee shall charge this emissions unit with screened, low fines raw materials in order to minimize or eliminate visible particulate emissions of fugitive dust.
P901	SO2: 740.3 lbs/hr	18-06 (E)(1)	N	Y	Y	Y	Y	N	N	Monitoring and record keeping for sulfur content of coke burned in this emissions unit.
P901	VE: 20 % opacity from stoves	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - Operational restrictions for baghouse and scrubbers.
P901	PE: 59.5 lbs/hr from stoves	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - Operational restrictions for baghouse and scrubbers.

P901	PE: 0.03 lb/ton from #1 cast house tapping	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>
P901	VE: 20 % opacity from #1 cast house tapping	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>

P901	VE: 20 % opacity from #1 cast house tapping	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>
P901	See Comme nts section	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>

P901	PE: 0.03 lb/ton from #2 cast house tapping	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>
P901	VE: 20 % opacity from #2 cast house tapping	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>

P901	See Comments section	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>
P901	VE: 20 % opacity from #2 cast house tapping	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	<p>OR - Operational restrictions for baghouse and scrubbers.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #1 is used, the main isolation valve from cast house #2 shall be closed resulting in maximum gas flow in the collection main from cast house #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p> <p>The existing emission capture system consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts shall be maintained and employed in accordance with the following standard operating practices. When cast house #2 is used, the main isolation valve from cast house #1 shall be closed resulting in maximum gas flow in the collection main from cast house #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.</p>
P902	VE: 5 % opacity from coal injection/slag blowing	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	<p>OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.</p>

P902	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.
P902	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.
P902	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
P902	PE: 60.1 lbs/hr	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
P902	SO2: 861.8 lbs/hr	18-06 (E)(1)	N	N	N	N	N	N	N	No monitoring or record keeping is required for the sulfur dioxide emission limit for this emissions unit because the maximum uncontrolled emission rate of sulfur dioxide cannot exceed the allowable emission limit.
P903	VE: 5 % opacity from coal injection/slag blowing	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
P903	See Comments section	17-07 (B)(1)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.
P903	See Comments section	17-08 (B)(3)	N	N	N	N	N	N	N	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.

P903	VE: 20 % opacity	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
P903	PE: 60.1 lbs/hr	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	OR - The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
P903	SO2: 861.8 lbs/hr	18-06 (E)(1)	N	N	N	N	N	N	N	No monitoring or record keeping is required for the sulfur dioxide emission limit for this emissions unit because the maximum uncontrolled emission rate of sulfur dioxide cannot exceed the allowable emission limit.
P905	VE: 20 % opacity	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse associated with pellet ore rail car unloading shall be maintained within the range of 3 to 7 inches of water while pellet ore is being unloaded. The pressure drop across the baghouse associated with pellet ore transfer at the transfer station shall be maintained within the range of 3 to 7 inches of water while pellet ore is being transferred. Pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening operations shall be adequately enclosed and vented to baghouses. The enclosures shall be sufficient to eliminate or minimize, at all times, any visible emissions of fugitive dust from the enclosures.
P905	PE: 0.015 lb/hr and 0.063 tpy from rail car unloading	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse associated with pellet ore rail car unloading shall be maintained within the range of 3 to 7 inches of water while pellet ore is being unloaded.
P905	PE: 0.016 lb/hr and 0.07 tpy from transfer	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse associated with pellet ore transfer at the transfer station shall be maintained within the range of 3 to 7 inches of water while pellet ore is being transferred.

P905	PE: 0.021 lb/hr and 0.092 tpy from screeni ng	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse associated with pellet ore screening shall be maintained within the range of 3 to 7 inches of water while pellet ore is being screened.
P905	VE: 20 % opacity	N	31-05 (A)(3)	Y	Y	Y	Y	N	N	<p>Pellet ore conveying to the ore yard stacker, pellet ore transfer from the yard belt transfer to the stacker boom conveyor, pellet ore yard belt conveyor loading from the reclaim hopper and unloading from conveyor belt P3 to the pellet surge bin, pellet ore conveying from the yard belt conveyor to the surge bin, and pellet ore transfer from conveyor belt unloading/loading through the screening station to the surge bin operations shall be adequately enclosed. The enclosures shall be sufficient to eliminate or minimize, at all times, any visible emissions of fugitive dust from the enclosures.</p> <p>Pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening operations shall be adequately enclosed and vented to baghouses. The enclosures shall be sufficient to eliminate or minimize, at all times, any visible emissions of fugitive dust from the enclosures.</p>
P906	PE: 46.8 lbs/hr from scrubbe r	17-11 (B)(1)	N	Y	Y	Y	Y	Y	N	<p>OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 2.5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 56 gallons per minute at all times while the emissions unit is in operation.</p> <p>OR - The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water while the emissions unit is in operation.</p>
P906	VE: 20 % opacity from baghou se and scrubbe r	17-07 (A)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 2.5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 56 gallons per minute at all times while the emissions unit is in operation. The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water while the emissions unit is in operation.
P906	HCl: 18 ppmv from scrubbe r	N	40 CFR, Part 63, Subpart CCC	Y	Y	Y	Y	Y	N	OR - The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 2.5 inches of water at all times while the emissions unit is in operation. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 56 gallons per minute at all times while the emissions unit is in operation.

P906	VE: 20 % opacity	17-07 (B)(1)	N	Y	Y	Y	Y	Y	N	The number 2 galvanizing line shall not be operated without the baghouse associated with the zinc coating pot.
P906	See Comme nts section	17-08 (B)(3)	N	Y	Y	Y	Y	Y	N	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from the number 2 galvanizing line zinc coating pot. The number 2 galvanizing line shall not be operated without the baghouse associated with the zinc coating pot.
R001	See Comme nts section	21-09 (O)(2)	N	Y	Y	Y	Y	N	N	OR - Equipment, operation, and maintenance standards for the cold cleaner. ET - There is no emission limit from OAC rule 3745-21-09(O), therefore testing is not required.

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.

