

Statement of Basis For Title V Permit

Company Name	Wheeling-Pittsburgh Steel Corporation	
Premise Number	0641090010	
What makes this facility a Title V facility?	Major emissions of PM, NOx, SO2, CO	
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.	No	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1, A.2, A.3, A.4	18-47 (C)		50 gr/100 dscf maximum H2S concentration in any by-product COG for combustion
A.5, A.6, A.7	N	Y	MACT hammer language

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												
B103 B104 B105 B106 B107 B108	20% opacity/6-min avg	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas, BFG, and desulfurized COG
B103 B104 B105 B106 B107 B108	0.020 lb/MMBtu PE (all fuels except BFG); 0.040 lb/MMBtu (BFG or BFG blend)	17-10 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas, BFG, and desulfurized COG
B103 B104 B105 B106 B107 B108	H2S content of COG limited to 50 gr/100dscf	18-47(c)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas, BFG, and desulfurized COG

B103 B104 B105 B106 B107 B108	4.45 lbs/MMBtu SO ₂ ; Max SO ₂ emissions from boilers 1 through 8, combined 1908 tons for any period of 365 consecutive days	18-47(I)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas, BFG, and desulfurized COG
B152	0.020 lb/MMBtu PE	17-10(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas only
B152	20% opacity/6-min avg	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas only
B152	Equivalent to OAC rules 3745-17-07(A) and 3745-17-10(B)(1)	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limited to natural gas only
F001 F101	Combined PM ₁₀ emissions shall not exceed 4.10 lb/hr	17-13 Appendix A	N	N	N	Y	N	N	Y	N	Y	N	Y	Y	Fugitive source of PM
F002 F103	No VEs except 13-minutes in any hour	17-07(B)(6)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	Fugitive source of PM
F002 F103	Use of RACM	17-08(B), (B)(6)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Fugitive source of PM

F003 F104	20% opacity/3-min avg	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	Fugitive source of PM
F003 F104	Use of RACM	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Fugitive source of PM
F003	Sinter moisture >/= 1.5%/weight	17-13(F)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR same as rule limit for sinter moisture content
F104	Sinter moisture >/= 1.5%/weight	17-13(E)(4)(a)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR same as rule limit for sinter moisture content
F005	20% opacity/3-min avg	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits area in which material handling can occur, in order to minimize fugitives.
F005	20% opacity/6-min avg	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits area in which material handling can occur, in order to minimize fugitives.
F005	Use of RACM	17-08(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR limits area in which material handling can occur (RACM), in order to minimize fugitives
F005	0.030 gr/dscf baghouse exhaust	17-08(B)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR requires that baghouse be in operation during matl handling
F009	20% opacity/3-min avg	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
F009	5.5 lb/hr PM	17-13(F)(4)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR specifies dP
F009	20% opacity/6-min avg	17-07(A)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
F009	Use of RACM	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	

F010	20.8 lb NOx/hr, 73.8 tons NOx/yr, 1.67 lb PM10/hr, 5.9 tons PM10/yr	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	Y	Y	N	TV Rp requirements more stringent than PTI
F010	20% opacity 3-min/avg	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	Y	Y	N	TV Rp requirements more stringent than PTI
F010	Use of RACM	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	No testing for RACM requirement
F010	Less stringent than 31-05(A)(3)	17-11(B)	N	N	N	Y	N	N	Y	N	Y	Y	Y	N	TV Rp requirements more stringent than PTI
F014	Use of RACM, 2.22 lb PM/hr, 9.72 tons PM/yr	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits amount of pellets to be unloaded
F014	20% opacity/3-min avg	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
F014	Less stringent than 31-05(A)(3)	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P006 P007 P008	20% opacity/6-min avg	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	limited to natural gas, desulfurized coke oven gas, number 2 fuel oil, or a combination
P006 P007 P008	Less stringent than 17-13(F)(5)	17-11(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	limited to natural gas, desulfurized coke oven gas, number 2 fuel oil, or a combination
P006 P007 P008	COG H2S content max 50 gr/100 dscf	18-47(C)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	limited to natural gas, desulfurized coke oven gas, number 2 fuel oil, or a combination

P006 P007 P008	6.0 lb/hr max PM	17- 13(F)(5)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	limited to natural gas, desulfurized coke oven gas, number 2 fuel oil, or a combination
P006 P007 P008	1212.7 lb/hr max SO2	18- 06(E)(2)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	limited to natural gas, desulfurized coke oven gas, number 2 fuel oil, or a combination
P009	0.020 gr PM/dscf, 2.3 lb PM/hr	31- 05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits dP as well as require use of baghouse
P009	20% opacity/6- min avg	17- 07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P009	Less stringent than 31- 05(A)(3)	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits dP as well as require use of baghouse
P009	20% opacity/3- min avg	17- 07(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P009	Use BAT	17- 08(B)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P009	BACT	OAC rule 3745-21 -08(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits dP as well as require use of baghouse
P009	BACT	OAC rule 3745-23 -06(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits dP as well as require use of baghouse

P010 P011 P012 P013	0.10 lb PM/hr, 0.44 ton PM/yr, 0.01 lb SO2/hr, 0.05 tons SO2/yr, 0.03 lb OC/hr, 0.15 ton OC/yr, 2.80 lb NOx/hr, 12.30 tons NOx/yr, 0.70 lb CO/hr, 3.07 tons CO/yr	31-05(A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits to natural gas only
P010 P011 P012 P013	20% opacity/3-min avg	17-07(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits to natural gas only
P010 P011 P012 P013	Less stringent than 31-05(A)(3)	17-11(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits to natural gas only
P010 P011 P012 P013	Less stringent than 31-05(A)(3)	18-06(E)(2)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR limits to natural gas only
P010 P011 P012 P013	BACT	OAC rule 3745-21-08(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P010 P011 P012 P013	BACT	OAC rule 3745-23-06(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P014	NA	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	COOLING TOWER - EMISSIONS <10 LB/HR, RULE NOT APPLICABLE.

P014	NA	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	COOLING TOWER - EMISSIONS <10 LB/HR, RULE NOT APPLICABLE
P015 P022 P112	20% opacity/6-min avg	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets maximum TDS
P015	100.5 lb PM/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets maximum TDS
P022	76.6 lb PM/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets maximum TDS
P112	Particulate emissions shall not exceed 70.7 lbs/hr.	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets maximum TDS
P021	50 gr/dscf maximum COG H2S concentration	18-47(C)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P021	20% opacity/3-min avg	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P021	Use of RACT	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	
P111	18ppmv HCL or 97% collection efficiency	40CFR 63, Subpart CCC	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements based on MACT language of 40 CFR 63 Subpart CCC.
P903 P911	Use of RACT	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

P903	opening tap hole, 20% opacity/3-min avg; closing tap hole, 20% opacity/3-min avg; changing torpedo cars, 20% opacity/1-min avg	17-13(F)(6)(a)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp for baghouse
P903 P911	20% opacity 6-min avg	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp for baghouse
P903 P911	MACT REQUIREMENTS	40 CFR 63 FFFFF	N	N	N	N	N	N	N	N	N	N	N	N	Specified in state/federal requirements
P903	Stove stack max 3.5 lb/hr PM	17-13(F)(6)(d)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P903	SO2 max 1978.4 lb/hr	18-06(E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P903	Maximum PM 0.48 lb/hr (flare)	17-13(F)(6)(c)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P903	Maximum PM 0.31 lb/hr (baghouse)	17-13(F)(6)(b)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P903 P911	20% opacity 3-minute avg.	17-07(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

P911	Particulate emissions from stove stack "A" shall not exceed 1.8 lbs/hr. Particulate emissions from stove stack "B" shall not exceed 0.87 lb/hr.	17-13(E)(5)(a)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P911	(SO2 1662.5 lbs/hr	18-06(E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P911	H2S content of COG < 50 grains of H2S per 100 dscf	18-47(C)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	Listed in state/federal requirements
P911	no PM from bleeders	17-13(E)(5)(b)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P904	20% opacity 6-min avg	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P904	MACT REQUIREMENTS	40 CFR 63 FFFFF	N	N	N	N	N	N	N	N	Y	N	N	N	Rule not yet promulgated - reporting requirements upon effective date.
P904	21.4 lb/hr PM from scrubber stack	17-13(F)(7)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR requires no simultaneous operation, use of fume suppression
P904	20% opacity 3-minute avg.	17-07(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR requires no simultaneous operation, use of fume suppression
P904	Use of RACT	17-08(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR requires no simultaneous operation, use of fume suppression, scrubber dP

P907	31-05 (A)(3)	equivalent to 17-07(A), 3745-17-07(B), 3745-17-08, and 3745-17-13(F)(8)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp and requires baghouse use
P907	17-07 (A)	20% opacity/6-min avg.	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp and requires baghouse use
P907	17-13 (F)(8)	5.0 lbs PM/hr stack emissions	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp and requires baghouse use
P907	17-07 (B)	20% opacity / 3-min avg fugitive	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets dp and requires baghouse use
P907	17-08	RACM	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR specifies RACM
P908	31-05 (A)(3)	0.0020 gr/acf baghouse PM emissions	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets parameters for baghouse
P908	17-07 (A)	20% / 6-min avg.	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P908	17-11	less stringent than 31-05	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets parameters for baghouse

P908	31-05 (A)(3)	10%/ 6-min avg from mat. trans. pts.	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P908	17-07 (B)	Lees stringent than 31-05	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P908	17-08 (B)	RACM	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets parameters for baghouse
P908	31-05 (A)(3)	0.020 gr/dscf PM or no VE from torit	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets parameters for baghouse
P908	31-05 (A)(3)	PE shall not exceed 0.72 lb/hr. PE shall not exceed 1.9 tpy.	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR sets parameters for baghouse
P909	17-07 (B)(1)	20% opacity/ 6-min avg	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P909	17-08 (B)	RACM	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
T102	40 CFR 63 subpart CCC	MACT requirement	N	N	N	Y	N	N	Y	N	Y	N	N	N	MACT doesn't require testing

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.