West Virginia Department of Environmental Protection

Division of Air Quality

Joe Manchin, III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate

Pursuant to

Title V

of the Clean Air Act

Issued to:

Mittal Steel USA - Weirton Inc.

R30-02900001-2007 (Part 3 of 3)

John A. Benedict
Director

Issued: December 15, 2006 • *Effective:* January 15, 2007
Expiration: December 15, 2011 • *Renewal Application Due:* June 15, 2011

Permit Number: **R30-02900001-2007 (Part 3 of 3)**
Permittee: **Mittal Steel USA - Weirton Inc.**
Mailing Address: **400 Three Springs Drive Weirton, WV 26062-4989**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Weirton, Hancock County, West Virginia
Mailing Address: 400 Three Springs Drive Weirton, WV 26062-4989
Telephone Number: 304-797-2000
Type of Business Entity: Corporation
Facility Description: Steel Manufacturing - Hot Side
SIC Codes: 3312
UTM Coordinates: 533.70 km Easting • 4474.50 km Northing • Zone 17

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
		BLAST FURNACES			
026/1 026/3 026/4 026/5 026/9	F920	**Blast Furnace No. 1 Charging** Casthouse Slips Flue dust handling Fume suppression	1929 - initial start of operation. Has been rebuilt several times over the years.	396 tons/hr	Baghouse and Flame suppression used to control cast house emissions
026/2	S920	Blast Stoves (3)			None
026/10	F949	Coke Handling and Storage: Hopper #1, Shaker Screen, Hopper #2, Conveyor C-1, Mini Skip Car, Hopper #3, Skip Cars, Coke Storage Piles, Clamshell Crane, Hopper #4, Sized Coke Storage Piles, MCP Screening Station, Coke Wharf, Conveyor C-2, Hopper #5, Conveyor C-3			Dust suppressants as needed
026/11	F950	Ore Yard: Ore Storage Yards #1 through #3, Bridge Cranes #1 through #4, Conveyor S-1 through S-5, Transfer Bin, Transfer Car			Dust suppressants as needed
026/6	F920A	Material Handling: Bins 1 through 19, Two Coke Bins, Scale Car, Two Skip Cars			Dust suppressants as needed
026/12	S951	Slag Granulator	1991	360,000 tons per year	None
026/7	F952	Flare from Blast Furnace No. 1	1929		None
		Blast Furnace No. 2 Charging - **Not to be operated**			
		Blast Furnace No. 3 Charging - **Not to be operated**			
029/1 029/3 029/4 029/5 029/9	F923	**Blast Furnace No. 4 Charging** Casthouse Slips Flue dust handling Fume suppression	1954 - Initial start of operation. Rebuilt	208 tons/hr	Flame and steam suppression used to control cast house emissions
029/2	S923A/B	Blast Stoves (4)			None
029/10	F949	Coke Handling and Storage: Hopper #1, Shaker Screen, Hopper #2, Conveyor C-1, Mini Skip Car, Hopper #3, Skip Cars, Coke Storage Piles, Clamshell Crane, Hopper #4, Sized Coke Storage Piles, MCP Screening Station, Coke Wharf, Conveyor C-2, Hopper #5, Conveyor C-3			Dust suppressants as needed
029/11	F950	Ore Yard: Ore Storage Yards #1 through #3, Bridge Cranes #1 through #4, Conveyor S-1 through S-5, Transfer Bin, Transfer Car	1929		Dust suppressants as needed
029/6	F923A	Material Handling: Bins 1 through 19, Two Coke Bins, Scale Car, Two Skip Cars	1954		Dust suppressants as needed
029/7	F953	Flare from Blast Furnace No. 4	1954		None
081	F935	Car Thaw Heaters	1929		None

1.0 Emission Units

BASIC OXYGEN PROCESS					
030/1,2	S927	BOP Vessels: includes captured emissions from Vessel 6 charging (030/3), melting and refining (030/1) and tapping (030/8); captured emissions from Vessel 7 charging (030/4), melting and refining (030/2) and tapping (030/9); and emissions from integral waste heat Boiler 146 (030/10) and Boiler 147 (030/11)	1967	487 tons/hr	Scrubber C927
030	F929	BOP Fugitives: material handling (030/23), natural gas fired ladle dryers (030/17), two degasser units' heaters (030/15 & 030/16) at the BOP. Uncaptured BOP process emissions include emissions during BOP Vessel 6 & 7 charging (030/3 & 030/4), melting/refining (030/1 & 030/2), tapping (030/8 & 030/9) and slagging (030/7), and emissions from hot metal transfer (030/6) and hot metal desulfurization (030/21)	1967	487 tons/hr	Building enclosure
030/6	S932	Hot Metal Transfer	1967	500 tons/hr	Baghouse C932
030/21	S930	Hot Metal Desulfurization	1967/1988	500 tons/hr	Baghouse C930
030/22	S930	CAS-OB Metallurgy	1992	365 tons/hr	Baghouse C930
CONTINUOUS CASTER					
030/5	F928	Continuous Caster	1968	487 tons/hr	N/A
030/14		Caster Cut-off Torches	1968	487 tons/hr	N/A
030/18		Caster Ladle Dryers	1968	487 tons/hr	N/A

2.0. General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NESHAPS**	National Emissions Standards for Hazardous Air Pollutants
CBI	Confidential Business Information		
CEM	Continuous Emission Monitor	**NO_x**	Nitrogen Oxides
CES	Certified Emission Statement	**NSPS**	New Source Performance Standards
C.F.R. *or* CFR	Code of Federal Regulations		
CO	Carbon Monoxide	**PM**	Particulate Matter
C.S.R. *or* CSR	Codes of State Rules	**PM_{10}**	Particulate Matter less than 10µm in diameter
DAQ	Division of Air Quality		
DEP	Department of Environmental Protection	**pph**	Pounds per Hour
		ppm	Parts per Million
FOIA	Freedom of Information Act	**PSD**	Prevention of Significant Deterioration
HAP	Hazardous Air Pollutant		
HON	Hazardous Organic NESHAP	**psi**	Pounds per Square Inch
HP	Horsepower	**SIC**	Standard Industrial Classification
lbs/hr	Pounds per Hour	**SIP**	State Implementation Plan
LDAR	Leak Detection and Repair	**SO_2**	Sulfur Dioxide
M	Thousand	**TAP**	Toxic Air Pollutant
MACT	Maximum Achievable Control Technology	**TPY**	Tons per Year
		TRS	Total Reduced Sulfur
MM	Million	**TSP**	Total Suspended Particulate
MMBtu/hr *or* mmbtu/hr	Million British Thermal Units per Hour	**USEPA**	United States Environmental Protection Agency
MMCF/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour	**UTM**	Universal Transverse Mercator
		VEE	Visual Emissions Evaluation
NA	Not Applicable	**VOC**	Volatile Organic Compounds
NAAQS	National Ambient Air Quality Standards		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. A permitted source may trade increases and decreases in emissions within the facility, where rules promulgated by the Secretary pursuant to provisions of Title I of the Clean Air Act and which are contained in the State Implementation Plan for West Virginia provide for such emissions trades without a permit modification. In such a case, the advance written notice provided by the permittee shall identify the applicable requirements allowing trading and shall state when the change will occur, the types and quantities of emissions to be traded, the permit terms or other applicable requirements with which the source will comply through emissions trading, and such other information as may be required by the Secretary.
[45CSR§30-5.8.b.]

2.11.4. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.
[45CSR§30-5.8.c.]

2.11.5. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.
[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not

include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary, in acting on the permit application or revision, has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

3.0. Facility-Wide Requirements for Part 3 of Facility

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.
[40 C.F.R. Part 61, subpart M and 45CSR15]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9. The permittee shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2.]

3.1.10. The permittee agrees that at all times, including periods of start-up, shutdown, and malfunction, that it will, to the extent practicable, maintain and operate all sources of SO_2 emissions, including any associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
[CO-SIP-C-2003-28, Condition IV.2.]

3.2. Monitoring Requirements

None.

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15), 45CSR§7-8.1. and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.
[45CSR§30-5.1.c.2.A.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class, or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate in writing:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review (3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.
[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement becomes effective during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. Permit R13-0987, Condition (A)(5) - the requirement that the dual station desulfurization unit replace the existing desulfurization unit has been completed.

b. CO 3-1977 required addition of equipment to the coke oven gas desulfurization at the Mainland Coke Facility which has been shut down.

c. CO 6-1978 required stack testing and additional fan capacity which has been completed. CO 6-1978 2 and CO 6-1978 3 required installation of charging controls at the mainland coke plant which has been shut down.

d. CO 7-1987 required installation of fume suppression systems on the blast furnace cast houses, which has been completed. In addition, Condition III.6.E. allows the termination of Paragraph III.6., which required dust control measures on plant roads and parking lots, upon the demonstration of compliance of the blooming mill scarfer as provided in Paragraph III.5.A. Although the blooming mill scarfer has been shut down, the controls were installed in accordance with the consent order, therefore Paragraph III.6.E was not included in the Title V permit.

e. CO 2-1989 and CO 12-1990 required the permanent closure of the Brown's Island and Mainland Coke Oven Batteries which has been completed. The Consent Orders also required the use of desulfurized coke oven gas from the Struthers Coke Oven Battery, which was never constructed.

f. CO-SIP-95-2 authorized SO_2 emission limits on the slag granulator and Basic Oxygen Process waste heat boilers and was entered into the SIP. It was determined that more stringent requirements were necessary, therefore CO-SIP-C-2003-28 was developed. In accordance with Section II.5. of CO-SIP-C-2003-28, the requirements from the January 1995 Consent Order were not included in the Title V Permit.

g. Civil Consent Decree 5-96-CV-171 has been terminated in accordance with Section XXXVIII.B. The permittee has certified completion and compliance with all requirements.

h. 40 CFR part 60, subparts K, Ka, and Kb - The storage tanks associated with the Hot Side of the facility are not subject to these subparts.

i. 40 CFR part 60 subpart N - The Basic Oxygen Process was constructed in 1967, before the subpart N applicability date of June 11, 1973.

j. 40 CFR part 63 subpart N - Continuous chromium electroplating of steel is different from the chromium electroplating operations regulated in the existing NESHAP standard. Therefore, the chromium electroplating operations are not applicable to 40 CFR 63 Subpart N.

k. 40 CFR 63 Subpart Q - NESHAP for Industrial Process Cooling Towers. No chromium-based water treatment chemicals are used at the facility.

l. 40 CFR 63 Subpart T - National Emissions Standards for Halogenated Solvent Cleaning. No halogenated solvent cleaning machines exist at the facility.

m. 40 CFR 63 Subpart FFFFF - The facility does not operate a sinter plant, therefore the requirements from this MACT for sinter operations were not included in the Title V permit.

4.0. Blast Furnace Requirements [Blast Furnaces, Casthouses, Slips, Flue dust handling, Fume suppression, and slag granulators]

4.1. Limitations and Standards

4.1.1. Visible emissions from a blast furnace cast house shall not exceed twenty percent (20%) opacity except for a period or periods aggregating no more than five (5) minutes in any sixty (60) minute period where the average opacity for the aggregated period shall not exceed forty percent (40%) opacity.
[45CSR§7-3.6.b.] See also Section 9.0. of this permit.

4.1.2. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

4.1.3. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in 45CSR§10-4.1.e. Compliance with the allowable sulfur dioxide concentration limitations shall be based on a block three (3) hour averaging time.
[45CSR§§10-4.1. and 4.2. (S920 and S923A/B)]

4.1.4. No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and U. S. EPA. Compliance with the allowable hydrogen sulfide concentration limitations for combustion sources set forth in 45CSR10 shall be based on a block three (3) hour averaging time.
[45CSR§§10-5.1. and 5.4.]

4.1.5. No owner or operator subject to the provisions of 45CSR10 shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[45CSR§10-11.1.]

4.1.6. In accordance with the R13-1200 permit application and its amendments:

(1) Maximum amount of slag processed shall not exceed 360,000 tons per year.

(2) Emissions from the stack venting granulation process shall not exceed the following:

(a)	PM	25.25 lb/hr	20.79 TPY
(b)	SO_2	500.8 lb/hr	412.9 TPY
(c)	CO	14.16 lb/hr	11.67 TPY
(d)	H_2S	166.94 lb/hr	137.6 TPY

[45CSR13 - Permit R13-1200, Condition (A) (S951)]

4.1.7. Blast furnaces designated #2 and #3 shall not recommence operation.
[CO-SIP-C-2003-28, Condition IV.3.(i)]

4.1.8. Blast Furnace #1 and #4 Stoves shall be limited to 60.1. lbs per hour of SO_2 each as determined by fuel usage and emission factor(s) for SO_2 (as determined pursuant to Section 4.2.2. or other emission factor(s) approved by the DEP).
[CO-SIP-C-2003-28, Condition IV.3.(j) and (l)]

4.1.9. The slag granulator shall be limited to 50 lbs per hour of SO_2.
[CO-SIP-C-2003-28, Condition IV.3.(n)]

4.2. Monitoring Requirements

4.2.1. Visual emission checks of each emission point subject to an opacity limit in Section 4.1.1. shall be conducted once per week during periods of normal facility operation using 40 C.F.R. 60 Appendix A, Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point subject to an opacity limit, compliance shall be determined by conducting tests in accordance with the methodology set forth in 45CSR7A "Compliance Test Procedures for 45CSR7." If no visible emissions are observed after one month, visible emission checks shall be conducted monthly. If any visible emissions are observed during the monthly emission checks, visible emission checks shall return to being performed weekly. If no visible emissions are observed after four months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month as noted above.
[45CSR§30-5.1.c.]

4.2.2. Compliance with the numerical emission limits set forth in Sections 4.1.8. and 4.1.9. of this permit shall be demonstrated based on emission calculations using the applicable daily fuel usage data and emission factors for SO_2 (14.45 pounds of SO_2 per million cubic feet for combustion of blast furnace gas as determined by testing).
[CO-SIP-C-2003-28, Condition V.5.]

4.3. Testing Requirements

4.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director.
[45CSR§§7-8.1. and 8.2.]

4.3.2. The permittee shall demonstrate compliance with Sections 4.1.3. and 4.1.4. by periodic testing in accordance with 40 CFR Part 60, Appendix A, Method 6, Method 15 or other equivalent EPA testing method approved by the Director and the approved monitoring plan (See Appendix A.)
[45CSR§10-8.1.]

4.4. Recordkeeping Requirements

4.4.1. Records of the visible emission checks conducted in accordance with Section 4.2.1 of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22, or 45CSR7A, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

4.4.2. The permittee shall maintain on-site all records of monitored data established in the monitoring plans. Such records shall be made available to the Director or his duly authorized representative upon request. Such records shall be retained on-site for a minimum of five years. Where appropriate the permittee may maintain such records in electronic form.
[45CSR§§10-8.3.a. and d.]

4.4.3. A daily operational log shall be maintained listing hours of operation and amount of slag processed. A calendar quarterly report shall be submitted to the DAQ which contains a summary of the daily logs. This report must be submitted to the DAQ no later than the 15th day following the last day of each calendar quarter.
[45CSR13 - Permit R13-1200, Condition (B)(1)]

4.4.4 The permittee shall monitor and record the amount of natural gas, blast furnace gas, and mixed gas combusted at all of the sources subject to numerical emission limits in Sections 4.1.7. and 4.1.8. of this permit. The Company shall maintain records of the fuel usage for a period of 5 years and make such records available to DEP upon request.
[CO-SIP-C-2003-28, Condition V.4.]

4.5. Reporting Requirements

4.5.1. None

4.6. Compliance Plan

4.6.1. None

5.0. Flare Requirements [Flares from Blast Furnaces No. 1 and 4]

5.1. Limitations and Standards

5.1.1. No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by the use of the following formula:

Emissions(lb/hr) = F x Incinerator Capacity (tons/hr)
where the factor, F, is as indicated in the table below:

Incinerator Capacity	F Factor
Less than 15,000 lbs/hr	5.43
15,000 lbs/hr or greater	2.72

Calculation for PM Emissions:
(2.72) x (75,000 ft^3/min) x (60 min/hr) x (0.078 lb/ft^3) x 1 ton/2000 lb **= 477.4 lb/hr**

[45CSR§6-4.1.]

5.1.2. No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater, except for smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up.
[45CSR§§6-4.3. and 4.4.]

5.1.3. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5.]

5.1.4. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6.]

5.1.5. No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and U. S. EPA.
[45CSR§10-5.1.]

5.1.6. Blast Furnace #1 Flare and #4 Flare shall be limited to 42.1 lbs per hour of SO_2 each as determined by fuel usage and emission factor(s) for SO_2 (as determined pursuant to Section 5.2.2. or other emission factor(s) approved by the DEP).
[CO-SIP-C-2003-28, Conditions IV.3.(k) and (m)]

5.2. Monitoring Requirements

5.2.1. The permittee shall monitor the PM emissions and opacity limits in Sections 5.1.1., 5.1.2. and 5.1.3. of this permit by conducting visual emission checks once per week during periods of normal facility operation using 40 C.F.R. 60 Appendix A, Method 22. If no visible emissions are observed after one month, visible emission checks shall be conducted monthly. If any visible emissions are observed during the monthly emission checks, visible emission checks shall return to being performed weekly. If no visible emissions are observed after four months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month as noted above.
[45CSR§30-5.1.c.]

5.2.2. Compliance with the numerical emission limits set forth in Section 5.1.6. of this permit shall be demonstrated based on emission calculations using the applicable daily fuel usage data and emission

factors for SO_2 ((14.45 pounds of SO_2 per million cubic feet for combustion of blast furnace gas as determined by testing).
[CO-SIP-C-2003-28, Condition V.5.]

5.2.3. The permittee shall demonstrate compliance with Section 5.1.5. of this permit as set forth in the approved monitoring plan (See Appendix A.)
[45CSR§10-8.1.]

5.3. Testing Requirements

5.3.1. None

5.4. Recordkeeping Requirements

5.4.1. Records of the visible emission checks conducted in accordance with Section 5.2.1. of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

5.4.2. The permittee shall monitor and record the amount of natural gas, blast furnace gas, and mixed gas combusted at the source subject to numerical emission limit in Section 5.1.6. of this permit. The Company shall maintain records of the fuel usage for a period of 5 years and make such records available to DEP upon request.
[CO-SIP-C-2003-28, Condition V.4.]

5.5. Reporting Requirements

5.5.1. None

5.6. Compliance Plan

5.6.1. None

6.0. Basic Oxygen Plant Requirements [Basic Oxygen Plant]

6.1. Limitations and Standards

6.1.1. Visible emissions from a basic oxygen process roof monitor shall not exceed twenty percent (20%) opacity except for a period or periods aggregating no more than three (3) minutes in any sixty (60) minute period where the average opacity for the aggregated period shall not exceed forty percent (40%) opacity.
[45CSR§7-3.6.a.] See also Section 9.0. of this permit.

6.1.2. Particulate matter emissions from the stack of the main (primary) air pollution control equipment of a basic oxygen process, including emissions from fuel firing in an integral waste heat boiler, shall not exceed 0.11 lbs/ton of steel produced (53.57 pph).
[45CSR§7-4.10.d. (Scrubber C927)]

6.1.3. Particulate matter emissions shall not exceed a concentration of 0.040 gr/dscf from hot metal transfer from torpedo car to BOF charging ladle during periods when hot metal transfer is actually performed.
[45CSR§7-4.10.g. (S932)]

6.1.4. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR§7-4.12.]

6.1.5. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

6.1.6. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in 45CSR§§10-4.1a. through. e. Compliance with the allowable sulfur dioxide concentration limitations shall be based on a block three (3) hour averaging time.
[45CSR§§10-4.1. and 4.2.]

6.1.7. No owner or operator subject to the provisions of 45CSR10 shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[45CSR§10-11.1.]

6.1.8. In accordance with the R13-0987 permit application and its amendments:

1. The concentration of particulate matter within the effluent of the 2-BH baghouse (S930) shall not exceed 0.01 grains per SCF.

2. The emissions of particulate matter from the 2-BH baghouse (S930) shall not exceed 9.1 pounds per hour.

3. The permitted system's two ladle collection hoods and the two slag pot collection hoods must maintain particulate matter capture efficiencies of at least 95%.

4. The amount of iron desulfurized in the permitted desulfurization unit (030/21) shall not exceed the hourly rate of 500 tons per hour, nor shall it exceed the annual rate of 2,900,000 tons per year.

[45CSR13 - Permit R13-0987, Condition (A) (C930 and S930)]

6.1.9. In accordance with the R13-1433 permit application and its amendments:

1. Emissions to the atmosphere from the CAS-OB system stack (S930) shall not exceed the following:

Pollutant	lb/hr	ton/yr
Particulates	0.42	2.0
Carbon Monoxide	5.7	15.6

2. Process material, including alloying agents, shall not exceed 357 tons per heat.

3. Maximum number of heats shall not exceed thirty (30) per day.

4. Maximum production of metallurgical grade steel suitable for processing shall not exceed 365 tons/hour.

[45CSR13 - Permit R13-1433, Condition (A) (S930 and 030/22)]

6.1.10. The BOP Waste Heat Boiler shall be pre-heated using steam sparging. Fuel fired at the Waste Heat Boiler shall be limited to Natural Gas, Mixed Gas or steel making process gas.
[CO-SIP-C-2003-28, Condition IV.3.(f) (030/10 and 030/11)]

6.1.11. No owner or operator shall cause to be discharged into the atmosphere from the slag skimming stations any secondary emissions that:

(1) exhibit greater than 10 percent opacity during the skimming operations, except that an opacity greater than 10 percent but less than 20 percent may occur once per steel production cycle.

(2) exit from a control device used solely for the collection of secondary emissions from skimming that contain particulate matter in excess of 0.010 gr/dscf.

[40 CFR §60.142a(a) and 45CSR16 (030/21)]

6.2. Monitoring Requirements

6.2.1. Visual emission checks of each emission point subject to an opacity limit in Section 6.1.1. of this permit shall be conducted once per week during periods of normal facility operation using 40 C.F.R. 60 Appendix A, Method 22. If during these checks, or at any other time, visible emissions are observed at any emission point, compliance shall be determined by conducting tests in accordance with the methodology set forth in 45CSR7A "Compliance Test Procedures for 45CSR7." If no visible emissions are observed after one month, visible emission checks shall be conducted monthly. If any visible emissions are observed during the monthly emission checks, visible emission checks shall return to being performed weekly. If no visible emissions are observed after four months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month. Records shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22, or 45CSR7A, whichever is appropriate. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

6.2.2. (a) Each owner or operator of an affected facility shall install, calibrate, operate, and maintain a monitoring device that continually measures and records for each steel production cycle the various rates or levels of exhaust ventilation at each phase of the cycle through each duct of the secondary emission capture system. The monitoring device or devices are to be placed at locations near each capture point of the secondary emission capture system to monitor the exhaust ventilation rates or levels adequately, or in alternative locations approved in advance by the Administrator.

(b) If a chart recorder is used, the owner or operator shall use chart recorders that are operated at a minimum chart speed of 3.8 cm/hr (1.5 in./hr).

(c) All monitoring devices required by Section 6.2.2.(a) of this permit are to be certified by the manufacturer to be accurate to within ±10 percent compared to Method 2 of appendix A of 40 CFR 60. The owner or operator shall recalibrate and check the device(s) annually and at other times as the Administrator may require, in accordance with the written instructions of the manufacturer and by comparing the device against Method 2.

(d) Each owner or operator subject to the requirements of Section 6.2.2.(a) of this permit shall report on a semiannual basis all measurements of exhaust ventilation rates or levels over any 3-hour period that average more than 10 percent below the average rates or levels of exhaust ventilation maintained during the most recent performance test conducted under 40CFR §60.8 in which the affected facility demonstrated compliance with the standard under Section 6.1.11.(2) of this permit. The accuracy of the respective measurements, not to exceed the values specified in Section 6.2.2.(c) of this permit, may be considered when determining the measurement results that must be reported.

[40 CFR §§60.143a and 45CSR16]

6.2.3. (a) When determining compliance with mass emission limits specified in Section 6.1.11.(2) of this permit, the owner or operator of an affected facility may elect to suspend shop operations not subject to this subpart during compliance testing.

(b) For the purpose of determining compliance with visible and mass emission standards, a steel production cycle begins when the scrap or hot metal is charged to the vessel (whichever operation occurs first) and terminates 3 minutes after slag is emptied from the vessel into the slag pot. Consecutive steel production cycles are not required for the purpose of determining compliance. Where a hot metal transfer or skimming station is an affected facility, the steel production cycle also includes the hot metal transfer or skimming operation for the next steel production cycle for the affected vessel. Visible emission observations for both hot metal transfer and skimming operations begin with the start of the operation and terminate 3 minutes after completion of the operation.

(c) For the purpose of determining compliance with visible emission standards specified in Section 6.1.11(1) of this permit, the starting and stopping times of regulated process operations shall be determined and the starting and stopping times of visible emissions data sets shall be determined accordingly.

(d) To determine compliance with Section 6.1.11(1) of this permit, select the data sets yielding the highest and second highest 3-minute average opacities for each steel production cycle. Compliance is achieved if the highest 3-minute average for each cycle observed is less than 20 percent and the second highest 3-minute average is 10 percent or less.

(e) To determine compliance with Section 6.1.11(2) of this permit, determine the concentration of particulate matter in exhaust gases exiting the secondary emission collection device with Method 5. Compliance is achieved if the concentration of particulate matter does not exceed 0.010 gr/dscf.

[40 C.F.R. §§ 60.145a(a)(c)(d)(e) and (f) and 45CSR16]

6.3. Testing Requirements

6.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety

practices. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR§§7-8.1. and 8.2.]

6.3.2. Compliance with Sections 6.1.8.1. and 6.1.8.2. shall be demonstrated in accordance with 45CSR7A - "Compliance Test Procedures for 45CSR7". As stated in 45CSR§7A-3.1.b. the mass emission compliance tests shall be conducted during periods of maximum production rates. The unit shall therefore desulfurize/skim hot metal (iron) at the maximum hourly rate of 500 tons per hour as listed in Section 1.0. of this permit.
[45CSR13 - Permit R13-0987, Condition (B)(4)]

6.3.3. Stack testing to determine compliance with the allowable CO emission rates listed in Section 6.1.9.1. of this permit shall be conducted utilizing Method 10 set forth in the Code of Federal Regulations 40 CFR 60, Appendix A. Stack testing for the purpose of establishing compliance with the provisions of this permit for particulate matter shall be done in accordance with "Compliance Test Procedures for 45CSR7 - `To Prevent and Control Particulate Air Pollution From Manufacturing Process Operations'".
[45CSR13 - Permit R13-1433, Condition (B)]

6.3.4. (a) In conducting the performance tests required in 40 C.F.R. §60.8, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of 40 C.F.R. 60 or other methods and procedures as specified in this section, except as provided in 40C.F.R. §60.8(b).

(b) The owner or operator shall determine compliance with the particulate matter standards in Section 6.1.11. of this permit as follows:

(1) Start and end times of each steel production cycle during each run shall be recorded (see Section 6.2.3. (b) and (c) of this permit for the definitions of start and end times of a cycle).

(2) Method 5 shall be used to determine the particulate matter concentration. Sampling shall be conducted only during the steel production cycle.

(3) Method 9 and the procedures of 40 C.F.R. §60.11 shall be used to determine opacity, except sections 2.4 and 2.5 of Method 9 shall be replaced with the following instructions for recording observations and reducing data:

(i) *Section 2.4.* Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals. During the initial performance test conducted pursuant to 40 C.F.R. §60.8, observations shall be made and recorded in this manner for a minimum of three steel production cycles. During any subsequent compliance test, observations may be made for any number of steel production cycles, although, where conditions permit, observations will generally be made for a minimum of three steel production cycles.

(ii) *Section 2.5.* Opacity shall be determined as an average of 12 consecutive observations recorded at 15-second intervals. For each steel production cycle, divide the observations recorded into sets of 12 consecutive observations. Sets need not be consecutive in time, and in no case shall two sets overlap. For each set of 12 observations, calculate the average by summing the opacity of 12 consecutive observations and dividing this sum by 12.

(c) In complying with the requirements of Section 6.2.2.(c) of this permit, the owner or operator shall conduct an initial test as follows:

(1) For devices that monitor and record the exhaust ventilation rate, compare velocity readings recorded by the monitoring device against the velocity readings obtained by Method 2. Take Method 2 readings at a point or points that would properly characterize the monitoring device's performance and that would adequately reflect the various rates of exhaust ventilation. Obtain readings at sufficient intervals to obtain 12 pairs of readings for each duct of the secondary

emission capture system. Compare the averages of the two sets to determine whether the monitoring device velocity is within ±10 percent of the Method 2 average.

(2) For devices that monitor the level of exhaust ventilation and record only step changes when a set point rate is reached, compare step changes recorded by the monitoring device against the velocity readings obtained by Method 2. Take Method 2 readings at a point or points that would properly characterize the performance of the monitoring device and that would adequately reflect the various rates of exhaust ventilation. Obtain readings at sufficient intervals to obtain 12 pairs of readings for each duct of the secondary emission capture system. Compare the averages of the two sets to determine whether the monitoring device step change is within ±10 percent of the setpoint rate.

(d) To comply with Section 6.2.2.(d) of this permit, the owner or operator shall use the monitoring device of Section 6.2.2.(a) of this permit to determine the exhaust ventilation rates or levels during the particulate matter runs. Each owner or operator shall then use these rates or levels to determine the 3-hour averages required by Section 6.2.2.(d) of this permit.

[40 CFR § 60.144a and 45CSR16]

6.4. Recordkeeping Requirements

6.4.1. The permittee shall maintain daily records of the number if ladles processed, tons of iron per ladle, and tons of iron desulfurized at the permitted desulfurization stations. These records shall be maintained for review by the West Virginia DEP upon request by the Director or his authorized representative.
[45CSR13 - Permit R13-0987, Condition (B)(1)]

6.4.2. The permittee shall maintain daily records of the number of heats and amount of process material to determine compliance with Sections 6.1.9.2. and 6.1.9.3. of this permit. To determine compliance with Section 6.1.9.4. of this permit, the permittee shall multiply the tons per heat by the number of heats per day, and divide by the number of hours the CAS-OB operated that day.
[45CSR§30-5.1.c.]

6.4.3. The Company shall monitor and record the amount of natural gas, blast furnace gas, and mixed gas combusted in the BOP Waste Heat Boiler. The Company shall maintain records of the fuel usage for a period of 5 years and make such records available to DEP upon request.
[CO-SIP-C-2003-28, Condition V.4.]

6.5. Reporting Requirements

6.5.1. The permittee shall submit copies of all notifications and reports required to be submitted to the USEPA under 40 CFR Part 60 subpart Na as it applies to the permitted source to the Secretary of the Department of Environmental Protection.
[45CSR13 - Permit R13-0987, Condition (B)(2)]

6.6. Compliance Plan

6.4.1. None

7.0. Continuous Caster Requirements [Caster, Cut-off torches, and Ladles]

7.1. Limitations and Standards

7.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except for smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§§7-3.1. and 3.2.]

7.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified in the table below:

Emission Unit ID	Description	PM Limit (pph)
030/5	Continous Caster	95.24
030/14	Caster Cut-off Torches	95.24
030/18	Caster Ladle Dryers	95.24

[45CSR§§7-4.1. and 4.4.]

7.1.3. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

7.2. Monitoring Requirements

7.2.1. The permittee shall monitor the opacity and PM emissions limits in Sections 7.1.1. and 7.1.2. of this permit by conducting visible emissions checks in accordance with Section 6.2.1.
[45CSR§30-5.1.c.]

7.3. Testing Requirements

7.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR§§7-8.1. and 8.2.]

7.4. Recordkeeping Requirements

7.4.1. Records of the visible emission checks conducted in accordance with Section 7.2.1. of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22, or 45CSR7A, whichever is appropriate. These records shall include,

at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

7.5. Reporting Requirements

7.5.1. None

7.6. Compliance Plan

7.6.1. None

8.0. Storage Structure Requirements [Lime Storage Silos]

8.1. Limitations and Standards

8.1.1. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 45CSR§7-5.1 is required to have a full enclosure and be equipped with a particulate matter control device.
[45CSR§7-3.7.]

8.1.2. No person shall cause, suffer, allow or permit any storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.]

8.2. Monitoring Requirements

8.2.1. The permittee shall monitor the visible emissions in Section 8.1.1. by conducting visual emission checks once per week during periods of normal facility operation using 40 C.F.R. 60 Appendix A, Method 22. If no visible emissions are observed after one month, visible emission checks shall be conducted monthly. If any visible emissions are observed during the monthly emission checks, visible emission checks shall return to being performed weekly. If no visible emissions are observed after four months, visible emission checks shall be conducted each calendar quarter. If any visible emissions are observed during the quarterly emission checks, visible emission checks shall return to being performed each calendar month as noted above.
[45CSR§30-5.1.c.]

8.3. Testing Requirements

8.3.1. None

8.4. Recordkeeping Requirements

8.4.1. Records of the visible emission checks conducted in accordance with Section 8.2.1. of this permit shall be maintained on site for a period of no less than five (5) years and shall include all data required by 40 C.F.R. 60 Appendix A, Method 22. These records shall include, at a minimum, the date and time of each visible emission check, the visible emissions survey results and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c.]

8.5. Reporting Requirements

8.5.1. None

8.6. Compliance Plan

8.6.1. None

9.0. 40 CFR Part 63, Subpart FFFFF (Integrated Iron and Steel Manufacturing Facilities MACT) and 45CSR 34 Requirements (Blast Furnaces, Blast Furnace casthouses, BOP and Ancillary Operations)

§ 63.7782 What parts of my plant does this subpart cover?

This subpart applies to each new and existing affected source at your integrated iron and steel manufacturing facility. The affected sources are each new or existing blast furnace and basic oxygen process furnace (BOPF) shop at your integrated iron and steel manufacturing facility. This subpart covers emissions from the blast furnace casthouse and the BOPF shop including each individual BOPF and shop ancillary operations (hot metal transfer, hot metal desulfurization, slag skimming, and ladle metallurgy). A blast furnace or BOPF shop at your integrated iron and steel manufacturing facility is existing if you commenced construction or reconstruction of the affected source before July 13, 2001.

Emission Limitations

§ 63.7790 What emission limitations must I meet?

(a) You must meet each emission limit and opacity limit as follows:

For . . .	You must not cause to be discharged to the atmosphere . . .
Each casthouse at an existing blast furnace	a. any gases that exit from a control device that contain particulate matter in excess of 0.01 gr/dscf [1]; and b. any secondary emissions that exit any opening in the casthouse or structure housing the blast furnace that exhibit opacity greater than 20 percent (6-minute average).
Each BOPF at an existing shop	a. from a primary emission control system for a BOPF with an open hood system that contain, on a flow-weighted basis, particulate matter in excess of 0.02 gr/dscf during the steel production cycle for an existing BOPF shop[1,2]; and b. from a control device used solely for the collection of secondary emissions from the BOPF that contain particulate matter in excess of 0.01 gr/dscf for an existing BOPF shop[1].
Each hot metal transfer, skimming, and desulfurization operation at a new or existing BOPF shop:	any gases that exit from a control device that contain particulate matter in excess of 0.01 gr/dscf for an existing BOPF shop[1].
Each ladle metallurgy operation at a new or existing BOPF shop:	any gases that exit from a control device that contain particulate matter in excess of 0.01 gr/dscf for an existing BOPF shop[1].
Each roof monitoring at an existing BOPF shop:	any secondary emissions that exit any opening in the BOPF shop or any other building housing the BOPF or BOPF shop operation that exhibit opacity greater than 20 percent (3-minute average).

[1] This concentration limit (gr/dscf) for a control device does not apply to discharges inside a casthouse at an existing blast furnace or inside an existing BOPF shop if the control device was installed before August 30, 2005.
[2] This limit applies to control devices operated in parallel for a single BOPF during the oxygen blow.

(b) (1) You must operate each capture system applied to emissions from a blast furnace casthouse or to secondary emissions from a BOPF at or above the lowest value or settings established for the operating limits in your operation and maintenance plan;

(2) For each venturi scrubber applied to meet any particulate emission limit in § 63.7790(a), you must maintain the hourly average pressure drop and scrubber water flow rate at or above the minimum levels established during the initial performance test.

Operation and Maintenance Requirements

§ 63.7800 What are my operation and maintenance requirements?

(a) As required by 40 CFR §63.6(e)(1)(i), you must always operate and maintain your affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this subpart.

(b) You must prepare and operate at all times according to a written operation and maintenance plan for each capture system or control device subject to an operating limit in 40 C.F.R.§63.7790(b). Each plan must address the following elements:

(1) Monthly inspections of the equipment that is important to the performance of the total capture system (*e.g.*, pressure sensors, dampers, and damper switches). This inspection must include observations of the physical appearance of the equipment (*e.g.*, presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in the ductwork, and fan erosion). The operation and maintenance plan also must include requirements to repair any defect or deficiency in the capture system before the next scheduled inspection.

(2) Preventative maintenance for each control device, including a preventative maintenance schedule that is consistent with the manufacturer's instructions for routine and long-term maintenance.

(3) Operating limits for each capture system applied to emissions from a blast furnace casthouse or to secondary emissions from a BOPF. You must establish the operating limits according to the following requirements:

(i) Select operating limit parameters appropriate for the capture system design that are representative and reliable indicators of the performance of the capture system. At a minimum, you must use appropriate operating limit parameters that indicate the level of the ventilation draft and the damper position settings for the capture system when operating to collect emissions, including revised settings for seasonal variations. Appropriate operating limit parameters for ventilation draft include, but are not limited to, volumetric flow rate through each separately ducted hood, total volumetric flow rate at the inlet to the control device to which the capture system is vented, fan motor amperage, or static pressure.

(ii) For each operating limit parameter selected in paragraph (b)(3)(i) of this section, designate the value or setting for the parameter at which the capture system operates during the process operation. If your operation allows for more than one process to be operating simultaneously, designate the value or setting for the parameter at which the capture system operates during each possible configuration that you may operate.

(iii) Include documentation in your plan to support your selection of the operating limits established for the capture system. This documentation must include a description of the capture system design, a description of the capture system operating during production, a description of each selected operating limit parameter, a rationale for why you chose the parameter, a description of the method used to monitor the parameter according to the requirements of §63.7830(a), and the data used to set the value or setting for the parameter for each of your process configurations.

(4) Corrective action procedures for baghouses equipped with bag leak detection systems. In the event a bag leak detection system alarm is triggered, you must initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the alarm, and complete the corrective action as soon as practicable. Corrective actions may include, but are not limited to:

(i) Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.

(ii) Sealing off defective bags or filter media.

(iii) Replacing defective bags or filter media or otherwise repairing the control device.

(iv) Sealing off a defective baghouse compartment.

(v) Cleaning the bag leak detection system probe, or otherwise repair the bag leak detection system.

(vi) Shutting down the process producing the particulate emissions.

(5) Corrective action procedures for venturi scrubbers equipped with continuous parameter monitoring systems (CPMS). In the event a venturi scrubber exceeds the operating limit in §63.7790(b)(2), you must take corrective actions consistent with your site-specific monitoring plan in accordance with §63.7831(a).

General Compliance Requirements

§ 63.7810 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations and operation and maintenance requirements in this subpart at all times, except during periods of startup, shutdown, and malfunction as defined in 40 C.F.R. §63.2.

(b) During the period between the compliance date of May 22, 2007 and the date upon which continuous monitoring systems have been installed and certified and any applicable operating limits have been set, you must maintain a log detailing the operation and maintenance of the process and emissions control equipment.

(c) You must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 C.F.R.§63.6(e)(3).

Initial Compliance Requirements

§ 63.7820 By what date must I conduct performance tests or other initial compliance demonstrations?

(a) You must conduct a performance test to demonstrate initial compliance with each emission and opacity limit in § 63.7790(a) that applies to you. You must conduct the performance tests within 180 calendar days after the compliance date of May 22, 2007 and report the results in your notification of compliance status.

(b) For each operation and maintenance requirement that applies to you where initial compliance is not demonstrated using a performance test or opacity observation, you must demonstrate initial compliance within 30 calendar days after the compliance date of May 22, 2007.

§ 63.7821 When must I conduct subsequent performance tests?
You must conduct subsequent performance tests to demonstrate compliance with all applicable PM and opacity limits in §63.7790(a) at the following frequencies: For each emissions unit equipped with a baghouse, you must conduct subsequent performance tests no less frequently than once during each term of your title V operating permit.

§ 63.7822 What test methods and other procedures must I use to demonstrate initial compliance with the emission limits for particulate matter?

(a) You must conduct each performance test that applies to your affected source according to the requirements in 40 C.F.R. §63.7(e)(1) and the conditions detailed in the following paragraphs:

(b) To determine compliance with the applicable emission limit for particulate matter in §63.7790(a), follow the test methods and procedures in paragraphs (b)(1) and (2) below.

(1) Determine the concentration of particulate matter according to the following test methods in appendix A to part 60:

(i) Method 1 to select sampling port locations and the number of traverse points. Sampling ports must be located at the outlet of the control device and prior to any releases to the atmosphere.

(ii) Method 2, 2F, or 2G to determine the volumetric flow rate of the stack gas.

(iii) Method 3, 3A, or 3B to determine the dry molecular weight of the stack gas.

(iv) Method 4 to determine the moisture content of the stack gas.

(v) Method 5, 5D, or 17, as applicable, to determine the concentration of particulate matter (front half filterable catch only).

(2) Collect a minimum sample volume of 60 dry standard cubic feet (dscf) of gas during each particulate matter test run. Three valid test runs are needed to comprise a performance test.

(d) If you apply two or more control devices in parallel to emissions from a BOPF, compute the average flow-weighted concentration for each test run using Equation 2 of this section as follows:

$$C_W = \frac{\sum_{i=1}^{n} C_i Q_i}{\sum_{i=1}^{n} Q_i} \qquad \text{(Eq. 2)}$$

Where:
C_w = Flow-weighted concentration, gr/dscf;
C_i = Concentration of particulate matter from exhaust stream "i", gr/dscf; and
Q_i = Volumetric flow rate of effluent gas from exhaust stream "i", dry standard cubic foot per minute (dscfm).

(e) For a control device applied to emissions from a blast furnace casthouse, sample for an integral number of furnace tapping operations sufficient to obtain at least 1 hour of sampling for each test run.

(f) For a primary emission control system applied to emissions from a BOPF with an open hood system and for a control device applied solely to secondary emissions from a BOPF, you must complete the following requirements:

(1) Sample only during the steel production cycle. Conduct sampling under conditions that are representative of normal operation. Record the start and end time of each steel production cycle and each period of abnormal operation; and

(2) Sample for an integral number of steel production cycles. The steel production cycle begins when the scrap is charged to the furnace and ends 3 minutes after the slag is emptied from the vessel into the slag pot.

(g) For a control device applied to emissions from BOPF shop ancillary operations (hot metal transfer, skimming, desulfurization, or ladle metallurgy), sample only when the operation(s) is being conducted.

(h) Subject to approval by the permitting authority, you may conduct representative sampling of stacks when there are more than three stacks associated with a process.

§ 63.7823 What test methods and other procedures must I use to demonstrate initial compliance with the opacity limits?

(a) You must conduct each performance test that applies to your affected source according to the requirements in 40 C.F.R. §63.7(h)(5) and the conditions detailed in paragraphs (b) through (d) below.
(b) You must conduct each visible emissions performance test such that the opacity observations overlap with the performance test for particulate matter.

(c) To determine compliance with the applicable opacity limit in §63.7790(a) for a blast furnace casthouse:

(1) Using a certified observer, determine the opacity of emissions according to Method 9 in appendix A to part 60 of this chapter.

(2) Obtain a minimum of 30 6-minute block averages. For a blast furnace casthouse, make observations during tapping of the furnace. Tapping begins when the furnace is opened, usually by creating a hole near the bottom of the furnace, and ends when the hole is plugged.

(d) To determine compliance with the applicable opacity limit in §63.7790(a) for BOPF shops:

(1) For an existing BOPF shop:

(i) Using a certified observer, determine the opacity of emissions according to Method 9 in appendix A to part 60 of this chapter except as specified in paragraphs (d)(1)(ii) and (iii) below.

(ii) Instead of procedures in section 2.4 of Method 9 in appendix A to part 60 of this chapter, record observations to the nearest 5 percent at 15-second intervals for at least three steel production cycles.

(iii) Instead of procedures in section 2.5 of Method 9 in appendix A to part 60 of this chapter, determine the 3-minute block average opacity from the average of 12 consecutive observations recorded at 15-second intervals.

(2) Opacity observations must cover the entire steel production cycle and must be made for at least three cycles. The steel production cycle begins when the scrap is charged to the furnace and ends 3 minutes after the slag is emptied from the vessel into the slag pot.

(3) Determine and record the starting and stopping times of the steel production cycle.

§ 63.7824 What test methods and other procedures must I use to establish and demonstrate initial compliance with operating limits?

(a) For each capture system subject to an operating limit in §63.7790(b)(1), you must certify that the system operated during the performance test at the site-specific operating limits established in your operation and maintenance plan using the procedures in paragraphs (a)(1) through (4) below.

(1) Concurrent with all opacity observations, measure and record values for each of the operating limit parameters in your capture system operation and maintenance plan according to the monitoring requirements specified in §63.7830(a).

(2) For any dampers that are manually set and remain at the same position at all times the capture system is operating, the damper position must be visually checked and recorded at the beginning and end of each opacity observation period segment.

(3) Review and record the monitoring data. Identify and explain any times the capture system operated outside the applicable operating limits.

(4) Certify in your performance test report that during all observation period segments, the capture system was operating at the values or settings established in your capture system operation and maintenance plan.

(b) For a venturi scrubber subject to operating limits for pressure drop and scrubber water flow rate in §63.7790(b)(2), you must establish site-specific operating limits according to the procedures in paragraphs (b)(1) and (2) below. You may establish the parametric monitoring limit during the initial performance test or during any other performance test run that meets the emission limit.

(1) Using the CPMS required in §63.7830(c), measure and record the pressure drop and scrubber water flow rate during each run of the particulate matter performance test.

(2) Compute and record the hourly average pressure drop and scrubber water flow rate for each individual test run. Your operating limits are the lowest average pressure drop and scrubber water flow rate value in any of the three runs that meet the applicable emission limit.

(c) You may change the operating limits for a capture system or venturi scrubber if you meet the following requirements:

(1) Submit a written notification to the Administrator of your request to conduct a new performance test to revise the operating limit.

(2) Conduct a performance test to demonstrate compliance with the applicable emission limitation in § 63.7790(a).

(3) Establish revised operating limits according to the applicable procedures in paragraphs (a) and (b) above for a control device or capture system.

§ 63.7825 How do I demonstrate initial compliance with the emission limitations that apply to me?

(a) For each affected source subject to an emission or opacity limit in § 63.7790(a), you have demonstrated initial compliance if:

(1) You meet the following conditions:

For . . .	You have demonstrated initial compliance if . . .
Each casthouse at an existing blast furnace	a. The average concentration of particulate matter from a control device applied to emissions from a casthouse, measured according to the performance test procedures in § 63.7822(e), did not exceed 0.01 gr/dscf; and b. The opacity of secondary emissions from each casthouse, determined according to the performance test procedures in §63.7823(c), did not exceed 20 percent (6-minute average).
Each BOPF at an existing BOPF shop	a. The average concentration of particulate matter from a primary emission control system applied to emissions from a BOPF with an open hood system, measured according to the performance test procedures in § 63.7822(f), did not exceed 0.02 gr/dscf for an existing BOPF shop; and b. The average concentration of particulate matter from a control device applied solely to secondary emissions from a BOPF, measured according to the performance test procedures in §63.7822(f), did not exceed 0.01 gr/dscf.
Each hot metal transfer skimming, and desulfurization at an existing BOPF shop.	The average concentration of particulate matter from a control device applied to emissions from hot metal transfer, skimming, or desulfurization, measured according to the performance test procedures in § 63.7822(g), did not exceed 0.01 gr/dscf.
Each ladle metallurgy operation at an existing BOPF shop	The average concentration of particulate matter from a control device applied to emissions from a ladle metallurgy operation, measured according to the performance test procedures in § 63.7822(g), did not exceed 0.01 gr/dscf.
Each roof monitor at an existing BOPF shop	The opacity of secondary emissions from each BOPF shop, determined according to the performance test procedures in § 63.7823(d), did not exceed 20 percent (3-minute average).

(2) For each capture system subject to the operating limit in §63.7790(b)(1), you have established appropriate site-specific operating limit(s) and have a record of the operating parameter data measured during the performance test in accordance with §63.7824(a)(1); and

(3) For each venturi scrubber subject to the operating limits for pressure drop and scrubber water flow rate in §63.7790(b)(2), you have established appropriate site-specific operating limits and have a record of the pressure drop and scrubber water flow rate measured during the performance test in accordance with §63.7824(b).

(c) For each emission limitation that applies to you, you must submit a notification of compliance status according to §63.7840(e).

§ 63.7826 How do I demonstrate initial compliance with the operation and maintenance requirements that apply to me?

(a) For a capture system applied to emissions from a blast furnace casthouse or to secondary emissions from a BOPF, you have demonstrated initial compliance if you meet all of the conditions in the following paragraphs:

(1) Prepared the capture system operation and maintenance plan according to the requirements of §63.7800(b), including monthly inspection procedures and detailed descriptions of the operating parameter(s) selected to monitor the capture system;

(2) Certified in your performance test report that the system operated during the test at the operating limits established in your operation and maintenance plan;

(3) Submitted a notification of compliance status according to the requirements in §63.7840(d), including a copy of the capture system operation and maintenance plan and your certification that you will operate the capture system at the values or settings established for the operating limits in that plan; and

(4) Prepared a site-specific monitoring plan according to the requirements in §63.7831(a).

(b) For each control device subject to operating limits in §63.7790(b)(2) or (3), you have demonstrated initial compliance if you meet all the following conditions:

(1) Prepared the control device operation and maintenance plan according to the requirements of §63.7800(b), including a preventative maintenance schedule and, as applicable, detailed descriptions of the corrective action procedures for baghouses and other control devices;

(2) Submitted a notification of compliance status according to the requirements in §63.7840(d), including a copy of the operation and maintenance plan; and

(3) Prepared a site-specific monitoring plan according to the requirements in §63.7831(a).

Continuous Compliance Requirements

§ 63.7830 What are my monitoring requirements?

(a) For each capture system subject to an operating limit in §63.7790(b)(1) established in your capture system operation and maintenance plan, you must install, operate, and maintain a CPMS according to the requirements in §63.7831(e) and the requirements in the following paragraphs:

(1) Dampers that are manually set and remain in the same position are exempt from the requirement to install and operate a CPMS. If dampers are not manually set and remain in the same position, you must make a visual check at least once every 24 hours to verify that each damper for the capture system is in the same position as during the initial performance test.

(2) If you use a flow measurement device to monitor the operating limit parameter for a blast furnace casthouse, you must monitor the hourly average rate (*e.g.*, the hourly average actual volumetric flow rate through each separately ducted hood, the average hourly total volumetric flow rate at the inlet to the control device) according to the requirements in §63.7832.

(3) If you use a flow measurement device to monitor the operating limit parameter for a capture system applied to secondary emissions from a BOPF, you must monitor the average rate for each steel production cycle (*e.g.*, the average actual volumetric flow rate through each separately ducted hood for each steel production cycle, the average total volumetric flow rate at the inlet to the control device for each steel production cycle) according to the requirements in §63.7832.

(b) Except as provided in paragraph (b)(3) of this section, you must meet the requirements in paragraph (b)(1) or (2) of this section for each baghouse applied to meet any particulate emission limit in § 63.7790(a). You must conduct inspections of each baghouse according to the requirements in paragraph (b)(4) of this section.

(1) Install, operate, and maintain a bag leak detection system according to §63.7831(f) and monitor the relative change in particulate matter loadings according to the requirements in §63.7832; or

(2) If you do not install and operate a bag leak detection system, you must install, operate, and maintain a COMS according to the requirements in §63.7831(h) and monitor the hourly average opacity of emissions exiting each control device stack according to the requirements in §63.7832.

(3) A bag leak detection system and COMS are not required for a baghouse that meets the following requirements:

(i) The baghouse is a positive pressure baghouse and is not equipped with exhaust gas stacks; and

(ii) The baghouse was installed before August 30, 2005.

(4) You must conduct inspections of each baghouse at the specified frequencies according to the following requirements:

(i) Monitor the pressure drop across each baghouse cell each day to ensure pressure drop is within the normal operating range identified in the manual.

(ii) Confirm that dust is being removed from hoppers through weekly visual inspections or other means of ensuring the proper functioning of removal mechanisms.

(iii) Check the compressed air supply for pulse-jet baghouses each day.

(iv) Monitor cleaning cycles to ensure proper operation using an appropriate methodology.

(v) Check bag cleaning mechanisms for proper functioning through monthly visual inspection or equivalent means.

(vi) Make monthly visual checks of bag tension on reverse air and shaker-type baghouses to ensure that bags are not kinked (kneed or bent) or laying on their sides. You do not have to make this check for shaker-type baghouses using self-tensioning (spring-loaded) devices.

(vii) Confirm the physical integrity of the baghouse through quarterly visual inspections of the baghouse interior for air leaks.

(viii) Inspect fans for wear, material buildup, and corrosion through quarterly visual inspections, vibration detectors, or equivalent means.

(c) For each venturi scrubber subject to the operating limits for pressure drop and scrubber water flow rate in §63.7790(b)(2), you must install, operate, and maintain CPMS according to the requirements in §63.7831(g) and monitor the hourly average pressure drop and water flow rate according to the requirements in §63.7832.

§ 63.7831 What are the installation, operation, and maintenance requirements for my monitors?

(a) For each CPMS required in §63.7830, you must develop and make available for inspection upon request by the permitting authority a site-specific monitoring plan that addresses the following requirements:

(1) Installation of the CPMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (*e.g.*, on or downstream of the last control device);

(2) Performance and equipment specifications for the sample interface, the parametric signal analyzer, and the data collection and reduction system;

(3) Performance evaluation procedures and acceptance criteria (*e.g.*, calibrations);

(4) Ongoing operation and maintenance procedures in accordance with the general requirements of 40 C.F.R. §§63.8(c)(1), (c)(3), (c)(4)(ii), (c)(7), and (c)(8);

(5) Ongoing data quality assurance procedures in accordance with the general requirements of 40 C.F.R. §63.8(d);

(6) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of 40 C.F.R. §§63.10(c), (e)(1), and (e)(2)(i);

(7) Corrective action procedures you will follow in the event a venturi scrubber exceeds the operating limit in 40 C.F.R. §63.7790(b)(2); and

(b) Unless otherwise specified, each CPMS must:

(1) Complete a minimum of one cycle of operation for each successive 15-minute period and collect a minimum of three of the required four data points to constitute a valid hour of data;

(2) Provide valid hourly data for at least 95 percent of every averaging period; and

(3) Determine and record the hourly average of all recorded readings.

(c) You must conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan.

(d) You must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan.

(e) For each capture system subject to an operating limit in §63.7790(b)(1), you must install, operate, and maintain each CPMS according to the requirements in § 63.7831(a) through (d).

(f) For each baghouse equipped with a bag leak detection system according to §63.7830(b)(1), you must install, operate, and maintain the bag leak detection system according to the following requirements:

(1) The system must be certified by the manufacturer to be capable of detecting emissions of particulate matter at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(2) The system must provide output of relative changes in particulate matter loadings.

(3) The system must be equipped with an alarm that will sound when an increase in relative particulate loadings is detected over a preset level. The alarm must be located such that it can be heard by the appropriate plant personnel.

(4) Each system that works based on the triboelectric effect must be installed, operated, and maintained in a manner consistent with the guidance document, "Fabric Filter Bag Leak Detection Guidance," EPA–454/R–98–015, September 1997. You may install, operate, and maintain other types of bag leak detection systems in a manner consistent with the manufacturer's written specifications and recommendations.

(5) To make the initial adjustment of the system, establish the baseline output by adjusting the sensitivity (range) and the averaging period of the device. Then, establish the alarm set points and the alarm delay time.

(6) Following the initial adjustment, do not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time, except as detailed in your operation and maintenance plan. Do not increase the sensitivity by more than 100 percent or decrease the sensitivity by more than 50 percent over a 365-day period unless a responsible official certifies, in writing, that the baghouse has been inspected and found to be in good operating condition.

(7) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(g) For each venturi scrubber subject to operating limits in §63.7790(b)(2) for pressure drop and scrubber water flow rate, you must install, operate, and maintain each CPMS according to the requirements in § 63.7831(a) through (d).

(h) For each baghouse equipped with a COMS according to §63.7830(b)(2), you must install, operate, and maintain each COMS according to the requirements in paragraphs (h)(1) through (4) below:

(1) You must install, operate, and maintain each COMS according to Performance Specification 1 in 40 CFR part 60, appendix B.

(2) You must conduct a performance evaluation of each COMS according to 40 C.F.R. §63.8 and Performance Specification 1 in appendix B to 40 CFR part 60.

(3) Each COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

(4) COMS data must be reduced to 6-minute averages as specified in 40 C.F.R. §63.8(g)(2) and to hourly averages where required by this subpart.

§ 63.7832 How do I monitor and collect data to demonstrate continuous compliance?

(a) Except for monitoring malfunctions, out-of-control periods as specified in 40 C.F.R. §63.8(c)(7), associated repairs, and required quality assurance or control activities (including as applicable, calibration checks and required zero and span adjustments), you must monitor continuously (or collect data at all required intervals) at all times an affected source is operating.

(b) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels or to fulfill a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing compliance.

(c) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

§ 63.7833 How do I demonstrate continuous compliance with the emission limitations that apply to me?

(a) You must demonstrate continuous compliance for each affected source subject to an emission or opacity limit in §63.7790(a) by meeting the following requirements:

For . . .	You must demonstrate continuous compliance by . . .
Each casthouse at an existing blast furnace.	a. Maintaining emissions of particulate matter from a control device at or below 0.01 gr/dscf; and b. Maintaining the opacity of secondary emissions that exit any opening in the casthouse or structure housing the casthouse at or below 20 percent (6-minute average); and c. Conducting subsequent performance tests at the frequencies specified in § 63.7821.
Each BOPF at an existing BOPF shop.	a. Maintaining emissions of particulate matter from the primary control system for a BOPF with an open hood system at or below 0.02 gr/dscf; and c. Maintaining emissions of particulate matter from a control device applied solely to secondary emissions from a BOPF at or below 0.01 gr/dscf; and d. Conducting subsequent performance tests at the frequencies specified in § 63.7821.

Each hot metal transfer, skimming, and desulfurization operation at an existing BOPF shop.	a. Maintaining emissions of particulate matter from a control device at or below 0.01 gr/dscf; and b. Conducting subsequent performance tests at the frequencies specified in § 63.7821.
Each ladle metallurgy operation at an existing BOPF shop.	a. Maintaining emissions of particulate matter from a control device at or below 0.01 gr/dscf; and b. Conducting subsequent performance tests at the frequencies specified in § 63.7821.
Each roof monitor at an existing BOPF shop.	a. Maintaining the opacity of secondary emissions that exit any opening in the BOPF shop or other building housing the BOPF shop or shop operation at or below 20 percent (3-minute average); and b. Conducting subsequent performance tests at the frequencies specified in § 63.7821.

(b) You must demonstrate continuous compliance for each capture system subject to an operating limit in §63.7790(b)(1) by meeting the following requirements: Operate the capture system at or above the lowest values or settings established for the operating limits in your operation and maintenance plan; and Monitor the capture system according to the requirements in §63.7830(a) and collect, reduce, and record the monitoring data for each of the operating limit parameters according to the applicable requirements of this subpart;

(c) For each baghouse applied to meet any particulate emission limit in § 63.7790(a), you must demonstrate continuous compliance by meeting the requirements in paragraph (c)(1) or (2) below as applicable, and paragraph (c)(3) below:

(1) For a baghouse equipped with a bag leak detection system, operating and maintaining each bag leak detection system according to §63.7831(f) and recording all information needed to document conformance with these requirements. If you increase or decrease the sensitivity of the bag leak detection system beyond the limits specified in §63.7831(f)(6), you must include a copy of the required written certification by a responsible official in the next semiannual compliance report.

(2) Inspecting each baghouse according to the requirements in §63.7830(b)(4) and maintaining all records needed to document conformance with these requirements.

(3) Maintaining records of the time you initiated corrective action in the event of a bag leak detection system alarm or when the hourly average opacity exceeded 5 percent, the corrective action(s) taken, and the date on which corrective action was completed.

(d) For each venturi scrubber subject to the operating limits for pressure drop and scrubber water flow rate in §63.7790(b)(2), you must demonstrate continuous compliance by meeting the requirements of paragraphs (d)(1) through (4) below:

(1) Maintaining the hourly average pressure drop and scrubber water flow rate at levels no lower than those established during the initial or subsequent performance test;

(2) Operating and maintaining each venturi scrubber CPMS according to §63.7831(g) and recording all information needed to document conformance with these requirements; and

(3) Collecting and reducing monitoring data for pressure drop and scrubber water flow rate according to §63.7831(b) and recording all information needed to document conformance with these requirements.

(4) If the hourly average pressure drop or scrubber water flow rate is below the operating limits, you must follow the corrective action procedures in paragraph (g) of this section.

(g) If the hourly average pressure drop or water flow rate for a venturi scrubber exceeds the operating limit, you must follow the procedures in paragraphs (g)(1) through (3) of this section.

(1) You must initiate corrective action to determine the cause of the exceedance within 1 hour. During any period of corrective action, you must continue to monitor and record all required operating parameters for equipment that remains in operation. Within 24 hours of the exceedance, you must measure and record the hourly average operating parameter value for the emission unit on which corrective action was taken. If the hourly average parameter value meets the applicable operating limit, then the corrective action was successful and the emission unit is in compliance with the applicable operating limit.

(2) If the initial corrective action required in paragraph (g)(1) of this section was not successful, you must complete additional corrective action within the next 24 hours (48 hours from the time of the exceedance). During any period of corrective action, you must continue to monitor and record all required operating parameters for equipment that remains in operation. After this second 24-hour period, you must again measure and record the hourly average operating parameter value for the emission unit on which corrective action was taken. If the hourly average parameter value meets the applicable operating limit, then the corrective action was successful and the emission unit is in compliance with the applicable operating limit.

(3) If the second attempt at corrective action required in paragraph (g)(2) of this section was not successful, you must report the exceedance as a deviation in your next semiannual compliance report according to §63.7841(b).

§ 63.7834 How do I demonstrate continuous compliance with the operation and maintenance requirements that apply to me?

(a) For each capture system and control device subject to an operating limit in §63.7790(b), you must demonstrate continuous compliance with the operation and maintenance requirements in §63.7800(b) by meeting the requirements of paragraphs (a)(1) through (4) of this section:

(1) Making monthly inspections of capture systems and initiating corrective action according to §63.7800(b)(1) and recording all information needed to document conformance with these requirements;

(2) Performing preventative maintenance according to §63.7800(b)(2) and recording all information needed to document conformance with these requirements;

(3) Initiating and completing corrective action for a baghouse equipped with a bag leak detection system or COMS according to §63.7800(b)(4) and recording all information needed to document conformance with these requirements, including the time you initiated corrective action, the corrective action(s) taken, and date on which corrective action was completed.

(4) Initiating and completing corrective action for a venturi scrubber equipped with a CPMS according to §63.7833(g) and recording all information needed to document conformance with these requirements, including the time you initiated corrective action, the corrective action(s) taken within the first 24 hours according to §63.7833(g)(1) and whether they were successful, the corrective action(s) taken within the second 24 hours according to §63.7833(g)(2) and whether they were successful, and the date on which corrective action was completed.

(b) You must maintain a current copy of the operation and maintenance plan required in §63.7800(b) onsite and available for inspection upon request. You must keep the plans for the life of the affected source or until the affected source is no longer subject to the requirements of this subpart.

§ 63.7835 What other requirements must I meet to demonstrate continuous compliance?

(a) *Deviations.* Except as provided in §63.7833(g), you must report each instance in which you did not meet each emission limitation in §63.7790 that applies to you. This includes periods of startup, shutdown, and malfunction. You also must report each instance in which you did not meet each operation and maintenance requirement in §63.7800 that applies to you. These instances are deviations from the emission limitations and operation and maintenance requirements in this subpart. These deviations must be reported according to the requirements in §63.7841.

(b) *Startups, shutdowns, and malfunctions.*

(1) Consistent with 40 C.F.R. §§63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with 40 C.F.R. §63.6(e)(1).

(2) The Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 C.F.R. §63.6(e).

Notifications, Reports, and Records

§ 63.7840 What notifications must I submit and when?

(a) You must submit all of the notifications in 40 C.F.R. §§63.6(h)(4) and (5), 63.7(b) and (c), 63.8(e) and (f)(4), and 63.9(b) through (h) that apply to you by the specified dates.

(b) As specified in 40 C.F.R. §63.9(b)(2), if you startup your affected source before May 20, 2003, you must submit your initial notification no later than September 17, 2003.

(c) If you are required to conduct a performance test, you must submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 C.F.R. §63.7(b)(1).

(d) If you are required to conduct a performance test, opacity observation, or other initial compliance demonstration, you must submit a notification of compliance status according to 40 C.F.R. §63.9(h)(2)(ii).

(1) For each initial compliance demonstration that does not include a performance test, you must submit the notification of compliance status before the close of business on the 30th calendar day following completion of the initial compliance demonstration.

(2) For each initial compliance demonstration that does include a performance test, you must submit the notification of compliance status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 C.F.R. §63.10(d)(2).

§ 63.7841 What reports must I submit and when?

(a) *Compliance report due dates.* Unless the Administrator has approved a different schedule, you must submit a semiannual compliance report to your permitting authority according to the requirements in paragraphs (a)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.7783 and ending on June 30 or December 31, whichever date comes first after the compliance date that is specified for your source in §63.7783.

(2) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(3) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (a)(1) through (4) of this section.

(b) *Compliance report contents.* Each compliance report must include the information in paragraphs (b)(1) through (3) of this section and, as applicable, paragraphs (b)(4) through (8) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your startup, shutdown, and malfunction plan, the compliance report must include the information in 40 C.F.R. §63.10(d)(5)(i).

(5) If there were no deviations from the continuous compliance requirements in §§63.7833 and 63.7834 that apply to you, a statement that there were no deviations from the emission limitations or operation and maintenance requirements during the reporting period.

(6) If there were no periods during which a continuous monitoring system (including a CPMS, COMS, or continuous emission monitoring system (CEMS) was out-of-control as specified in 40 C.F.R. §63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period.

(7) For each deviation from an emission limitation in §63.7790 that occurs at an affected source where you are not using a continuous monitoring system (including a CPMS, COMS, or CEMS) to comply with an emission limitation in this subpart, the compliance report must contain the information in paragraphs (b)(1) through (4) of this section and the information in paragraphs (b)(7)(i) and (ii) of this section. This includes periods of startup, shutdown, and malfunction.

(i) The total operating time of each affected source during the reporting period.

(ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.

(8) For each deviation from an emission limitation occurring at an affected source where you are using a continuous monitoring system (including a CPMS or COMS) to comply with the emission limitation in this subpart, you must include the information in paragraphs (b)(1) through (4) of this section and the information in paragraphs (b)(8)(i) through (xi) of this section. This includes periods of startup, shutdown, and malfunction.

(i) The date and time that each malfunction started and stopped.

(ii) The date and time that each continuous monitoring was inoperative, except for zero (low-level) and high-level checks.

(iii) The date, time, and duration that each continuous monitoring system was out-of-control as specified in 40 C.F.R. §63.8(c)(7), including the information in 40 C.F.R. §63.8(c)(8).

(iv) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(v) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(vi) A breakdown of the total duration of the deviations during the reporting period including those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(vii) A summary of the total duration of continuous monitoring system downtime during the reporting period and the total duration of continuous monitoring system downtime as a percent of the total source operating time during the reporting period.

(viii) A brief description of the process units.

(ix) A brief description of the continuous monitoring system.

(x) The date of the latest continuous monitoring system certification or audit.

(xi) A description of any changes in continuous monitoring systems, processes, or controls since the last reporting period.

(c) *Immediate startup, shutdown, and malfunction report.* If you had a startup, shutdown, or malfunction during the semiannual reporting period that was not consistent with your startup, shutdown, and malfunction plan, you must submit an immediate startup, shutdown, and malfunction report according to the requirements in §63.10(d)(5)(ii).

(d) *Part 70 monitoring report.* If you have obtained a title V operating permit for an affected source pursuant to 40 CFR part 70 or 71, you must report all deviations as defined in this subpart in the semiannual monitoring report. If you submit a compliance report for an affected source along with, or as part of, the semiannual monitoring report, and the compliance report includes all the required information concerning deviations from any emission limitation or operation and maintenance requirement in this subpart, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report does not otherwise affect any obligation you may have to report deviations from permit requirements for an affected source to your permitting authority.

§ 63.7842 What records must I keep?

(a) You must keep the following records:

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any initial notification or notification of compliance status that you submitted, according to the requirements in 40 C.F.R. §63.10(b)(2)(xiv).

(2) The records in 40 C.F.R. §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Records of performance tests, performance evaluations, and opacity observations as required in 40 C.F.R. §63.10(b)(2)(viii).

(b) For each COMS, you must keep the records specified in paragraphs (b)(1) through (4) below:

(1) Records described in 40 C.F.R. §63.10(b)(2)(vi) through (xi).

(2) Monitoring data for a performance evaluation as required in 40 C.F.R. §63.6(h)(7)(i) and (ii).

(3) Previous (that is, superceded) versions of the performance evaluation plan as required in 40 C.F.R. §63.8(d)(3).

(4) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(c) You must keep the records required in 40 C.F.R. §63.6(h)(6) for visual observations.

(d) You must keep the records required in §§63.7833 and 63.7834 to show continuous compliance with each emission limitation and operation and maintenance requirement that applies to you.

§ 63.7843 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to 40 C.F.R. §63.10(b)(1).

(b) As specified in 40 C.F.R. §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 C.F.R. §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

APPENDIX A

PROPOSED
MONITORING & RECORDKEEPING PLANS
FOR SULFUR OXIDE SOURCES
UNDER 45 CSR 10
AT WEIRTON STEEL CORPORATION
WEIRTON, WEST VIRGINIA

FEBRUARY 2001
(Revised August 2001)

(a) Regulatory Requirement

In accordance with 45 CSR 10 §8.2.c, the following is the proposed plan for monitoring compliance with the sulfur dioxide weight emissions standards expressed in 45 CSR 10 §3, 4 and 5.

(b) Facility Information:

Facility Name:	Weirton Steel Corporation
Facility Address:	Weirton Steel Corporation 400 Three Springs Drive Weirton, West Virginia 26062
Facility Contact:	Clark Francy (724) 797-3908

Facility Description:

Weirton Steel Corporation is an integrated steel mill.

It is located in the City of Weirton, Hancock County, West Virginia.

Operations include:

- Iron Making
- Steel Making
- Steel Rolling, Finishing and Coating

(c) Affected Units:

Units which are regulated by 45 CSR 10 are Fuel Burning Units as defined in 45 CSR 10 §2.8 and Manufacturing Process as defined in 45 CSR 10 §2.11 and Combustion Sources as defined in 45 CSR 10A §6.3.

Those units which are solely fueled by natural gas are exempt from the requirements of 45 CSR 10 § 8 and therefore are not included in this plan. (45 CSR 10 § 10.3 & 45 CSR 10A §3.1.b)

The specific units affected are:

Fuel Burning Units

- # 3 Boiler
- # 4 Boiler
- # 5 Boiler
- # 101 and #102 Boilers (common stack)

Manufacturing process units

- No. 1 Blast Furnace Stoves
  (#1,#2,#3 – Combined Stack)
- No. 4 Blast Furnace Stoves
  (#11, #12, #13 – Combined Stack,#14 – Separate Stack)
- No. 2 Blast Furnace Flare (Receives gas from No.1)
- No. 4 Blast Furnace Flare
- No. 1 Blast Furnace Slag Granulater

There is no combustion associated with the No. 1 Blast Furnace Slag Granulater. The sulfur dioxide emissions are generated from residual sulfur compounds in the slag. All other manufacturing process sources are also combustion sources.

Combustion Units

The following units are also fueled with process gas from blast furnace operations and in addition to being a fuel burning unit or manufacturing process unit are also defined as a combustion unit per 45 CSR 10A §6.3. These units are:

- # 3 Boiler
- # 4 Boiler
- # 5 Boiler
- # 101 and #102 Boilers (common stack)
- No. 1 Blast Furnace Stoves
  (#1,#2,#3 – Combined Stack)
- No. 4 Blast Furnace Stoves
  (#11, #12, #13 – Combined Stack, #14 – Separate Stack)
- No. 2 Blast Furnace Flare (Receives gas from No.1)
- No. 4 Blast Furnace Flare

No. 1 Blast Furnace Stoves (3) and No. 4 Blast Furnace Stoves (4)

Fuels used in these units are natural gas and blast furnace gas. These units are manufacturing process units and combustion units.

Stream sampling has shown that the blast furnace process gas which is burned contains less than 45 grains of H2S per 1000 cubic feet. Per 45 CSR 10A § 6.3.b, "The owner or operator of a combustion source(s) which has a refinery process gas stream or any other process gas stream that contains an average hydrogen sulfide concentration greater than or equal to 45 grains per 100 cubic feet shall use CEMS to satisfy the requirements of an approved monitoring plan. Therefore, CEMS are not required as part of the monitoring plan for these units.

The proposed monitoring plan for these units will be to assume that all sulfur compounds are converted to sulfur dioxide. The sulfur concentration for the various fuels will be determined as follows:

- Natural Gas - the sulfur content provided by the supplier will be used.
- Blast Furnace Gas – is significantly lower in sulfur than the 45 grains per 100 cubic feet noted in the regulation requiring a CEM. In addition sampling and analysis are not easily performed. Annual sulfur analysis will be performed for two consecutive years and used to establish sulfur concentration in this fuel.

<u>Reporting, Recordkeeping and Operating Parameters</u>

Per the requirements of 45 CSR 10A §7.1, records shall be maintained noting operating schedule, and the quality and quantity of fuel burned.

Operating schedule records for each blast furnace stoves shall include:

- Daily quantity and type of fuel burned

Fuel Quality

- Natural gas and resulting mixed gas (70% natural gas/30% make-up air) - annual supplier provided BTU and sulfur analysis.
- Blast furnace gas - established analysis, as described above, from an outside certified laboratory.

No. 2 Blast Furnace Flare and No. 4 Blast Furnace Flare

Excess blast furnace gas is burned in these units. These units are manufacturing process units and combustion units.

Stream sampling has shown that the blast furnace process gas which is burned contains less than 45 grains of H2S per 1000 cubic feet. Per 45 CSR 10A § 6.3.b, "The owner or operator of a combustion source(s) which has a refinery process gas stream or any other process gas stream that contains an average hydrogen sulfide concentration greater than or equal to 45 grains per 100 cubic feet shall use CEMS to satisfy the requirements of an approved monitoring plan. Therefore, CEMS are not required as part of the monitoring plan for these units. In addition, these units are flares and this would not be a feasible application for a CEM.

The proposed monitoring plan for these units will be to assume that all sulfur compounds are converted to sulfur dioxide. The sulfur concentration for the various fuels will be determined as follows:

- Blast Furnace Gas – is significantly lower in sulfur than the 45 grains per 100 cubic feet noted in the regulation requiring a CEM. In addition sampling and analysis are not easily performed. Annual sulfur analysis will be performed for two consecutive years and used to establish sulfur concentration in this fuel.

Reporting, Recordkeeping and Operating Parameters

Per the requirements of 45 CSR 10A §7.1, records shall be maintained noting operating schedule, and the quality and quantity of fuel burned.

Operating schedule records for each flare shall include:

- Daily quantity and type of fuel burned

Fuel Quality

- Natural gas and resulting mixed gas (70% natural gas/30% make-up air) - annual supplier provided BTU and sulfur analysis.
- Blast furnace gas - established analysis, as described above, from an outside certified laboratory.

No. 1 Blast Furnace Slag Granulater

The emissions based upon previous testing are significantly below the allowable level under this unit's operating permit. Weirton Steel Corporation does not believe a CEM is appropriate means to measure sulfur dioxide emissions from this source.

Weirton Steel Corporation proposes stack testing, at no more frequent than 5 year intervals, instead of a CEM per 45 10A CSR §6.2.b.1 for the following reasons:

- High moisture concentrations in the exhaust stream result in extreme operational and maintenance issues for a CEM.
- Intermittent operation does not support the use of a CEM in this service.
- The current condition of the steel industry would make the installation of a CEM for this service a severe financial hardship for this facility.

Reporting, Recordkeeping and Operating Parameters

There are no specific reporting requirements in 45 CSR 10A §7.1 for this type of source. For this source, Weirton Steel Corporation will maintain operating schedule records which shall include:

- Date and time of start-up and shutdown

(e) Monitoring Plan Recordkeeping

All applicable records shall be kept for a period of five years.

(f) Excursion Response Plan

Weirton Steel Corporation controls sulfur dioxide emissions by controlling fuel sulfur concentration and the quantity of the fuels used. Operating ranges for each boiler is established based upon fuel sulfur concentrations and the quantity used.

Fuels with excessive sulfur concentrations are reviewed and rejected when necessary. Changes of sulfur concentration can impact the quantity of fuel used. If upon review, an excursion is discovered, the fuel usage rate or sulfur concentrations will be adjusted appropriately.

(g) Implementation Plan

Upon approval of this monitoring plan or any subsequent revisions to the plan, an implementation period is necessary to properly commence required testing, data gathering, monitoring, recordkeeping and reporting. The reporting and recordkeeping systems described in this plan require sixty days from the receipt of the final plan approval for implementation. The annual gas sampling, described above, will be initiated within six months from receipt of this approval. The subsequent gas sample will be collected and tested no sooner than six months and no later than one year after the first sample was taken.

Any modification to this plan requires the implementation schedule be reviewed and properly amended. Modifications are any changes to the submitted plan and include but are not limited to variations in monitoring or tracking methodology, additional instrumentation or other capital improvements, and/or additional requests or conditions.

APPENDIX B

Rend's copy

dep

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone 304/926-0475 • FAX: 304/926-0479

Joe Manchin, III, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

May 22, 2006

CERTIFIED MAIL
7003-2260-0006-0057-1269

I.D. No. 029-00001 Reg. 34 (40 CFR 63, Subpart FFFFF)
Company ISG Weirton, Inc.
Facility Weirton Region
Initials RMC

Louis Schorsch, President and CEO
ISG Weirton Inc.
4020 Kinross Lakes Parkway
Richfield, OH 44286-9000

RE: Approval of Extension of Compliance and Performance Testing up to May 22, 2007
Integrated Iron and Steel MACT - 40 CFR 63, Subpart FFFFF
Weirton, WV Plant ID No. 029-00001

Dear Mr. Schorsch:

The West Virginia Division of Air Quality (DAQ) received a request from ISG Weirton, Inc. for a compliance extension per provisions in 40 CFR 63.(i)(4)(i)(A) of the National Emission Standards for Hazardous Air Pollutants, General Provisions. Specifically, ISG Weirton has requested a one-year compliance extension from the provisions in the Integrated Iron and Steel MACT at 40 CFR 63, Subpart FFFFF. The regulation was proposed on July 13, 2001 and promulgated on May 20, 2003. The Integrated Iron and Steel MACT requires existing facilities to comply with the requirements by May 22, 2006. ISG Weirton's Basic Oxygen Plant (hot-end) was shutdown on June 16, 2005 due to low market demand for steel, during the final stages of installation and calibration of instrumentation necessary for monitoring the control devices (for example, programmable logic circuits on the scrubber and baghouse leak detectors). It is understood that the scrubber and baghouses required by the Integrated Iron and Steel MACT have been installed and are operational immediately upon re-start; it is only the instrumentation necessary for monitoring and reporting on these control devices as well as the roof monitors that need to be installed upon re-start of the No. 1 Blast Furnace, No. 4 Blast Furnace, and the Basic Oxygen Plant.

ISG Weirton submitted a MACT extension request for the Integrated Iron and Steel MACT on January 9, 2006, including a schedule for the final design, purchase, installation and calibration of instrumentation for monitoring and emission controls. A second letter identifying the affected sources was submitted on April 18, 2006. The facility has stated that their legal business name will become Mittal Steel USA - Weirton Inc. within the next few weeks, and the appropriate administrative paperwork will be submitted at that time with the WV Secretary of State's Office as well as this agency.

Section 40 CFR 63.(i)(4)(i)(B) requires that a request for an extension of compliance with a relevant standard be submitted in writing to the appropriate authority not later than 120 days before the affected source's compliance date. Recognizing ISG Weirton's request for a compliance extension was submitted in a timely manner and reasonable efforts will be undertaken to obtain, install, and test necessary instrumentation for the existing control equipment, DAQ conditionally approves ISG Weirton's request for a one-year compliance extension from the Integrated Iron and Steel MACT up to **May 22, 2007** for the following affected sources:

NON CONFIDENTIAL

AREA	OPERATION	AFFECTED SOURCE/ CONTROL DEVICE	TITLE V PERMIT IDENTIFICATION
Blast Furnace	No. 1 Blast Furnace	Cast House ~ Roof Monitors	Emission Unit Local ID is 026 For No. 1 Blast Furnace
	No. 1 Blast Furnace	Cast House ~ Bag House	Emission Unit Local ID for No 1. Blast Furnace is 026. However, This Bag House is not specifically identified in the Title V permit Application
	No. 4 Blast Furnace	Cast House ~ Roof Monitors	Emission Unit Local ID is 029 For No. 4 Blast Furnace
Basic Oxygen Plant (BOP)	Main Shop	Roof Monitors	Emission Unit Local ID is 030 for BOP Process Fugitives
	Main Shop	Hot Metal Transfer Operation Bag House	Emission Unit Local ID is 030/6
	Main Shop	Hot Metal Desulfurization Bag House	Emission Unit Local ID is 030/21
	Main Shop	CAS-OB Operation	This operation is vented through the Hot Metal Desulfurization Bag House which is Local ID 030/21
	No. 6 Furnace & No. 7 Furnace	Scrubber	Emission Unit Local ID is 030/1,2

This approval is subject to the following conditions:

1. During the period of this compliance extension, ISG Weirton shall maintain and operate all existing control equipment required for MACT compliance immediately upon re-start of the hot-end - No. 1 Blast Furnace Baghouse; Hot Metal Transfer Operation Baghouse; Hot Metal Desulfurization Baghouse, and No. 6 and 7 Furnaces Scrubber - in order to minimize emissions of hazardous air pollutants (HAPs) and criteria pollutants.

2. During the period of this compliance extension, ISG Weirton shall operate in compliance with all other applicable local, state, and federal regulations.

3. All activities required for installation of instrumentation necessary for monitoring and reporting to comply with the Integrated Iron and Steel MACT shall be completed as soon as practicable, but not later than the dates listed on pages 3 - 4 of the January 9, 2006 letter from Brian James, Plant Manager of ISG Weirton, Inc., to John Benedict, Director, DAQ.

4. Initial performance testing for all applicable emission limits, as well as operation and maintenance requirements, shall be conducted as soon as practicable within 180 days of startup of the affected sources, but not later than November 22, 2007, whichever is later. Notification of intent to conduct a performance test as well as the testing protocols must be submitted to DAQ at least 60 calendar days before the performance test is scheduled to begin.

5. Progress reports shall be submitted to the DAQ on a semi-annual basis, beginning with the last quarter of 2006 and continuing to the completion of this compliance extension. Reports shall be submitted to the DAQ no later than fifteen (15) days from the end of each quarter, and state the operational status, and progress towards meeting the milestone dates listed on pages 3 - 4 of the January 9, 2006 letter from Brian James, Plant Manager of ISG Weirton, Inc., to John Benedict, Director, DAQ.

6 This reporting provision is not applicable while the hot-side is not in operation, but goes into effect immediately upon re-start. If ISG Weirton is unable to meet any of the activity completion dates listed on pages 3 - 4 of the January 9, 2006 letter from Brian James, Plant Manager of ISG Weirton, Inc., to John Benedict, Director, DAQ, the agency shall be notified as soon as possible, but not to exceed seven (7) calendar days after becoming aware of delays. This notice must explain the delay and propose a revised completion date for affected activities in order to meet the May 22, 2007 extended MACT compliance date.

Please be aware the Administrator may terminate an extension of compliance at an earlier date than designated if any specification regarding the dates by which steps toward compliance are to be taken, or other applicable requirements to which the compliance extension applies (for example, performance tests) are not being met.

7. If any activities required for compliance with 40 CFR 63, Subpart FFFFF are not completed by the May 22, 2007 extension deadline, ISG Weirton shall not be allowed to operate these units after this date unless and until the required upgrades have been completed or they are operated under a practically enforceable consent order issued by the agency.

Should you require further assistance, or if you have any questions, please contact Renu Chakrabarty at (304) 926-0499, extension 1246.

Sincerely,

John A. Benedict
Director

Enclosure: 1 (January 9, 2006 letter from Brian James, Plant Manager of ISG Weirton, Inc., to John Benedict, Director of DAQ, containing extended compliance schedule on pages 3 - 4)

cc: Brian James, ISG Weirton Inc.
Paul Tomiczek, III, REM, P.E., ISG Weirton,Inc.
Clark Francy, ISG Weirton Inc.
Judith Katz, Director, Air Protection Division, US EPA Region III, 3AP00
Chris Pilla, Chief, Air Enforcement Branch, US EPA Region III, 3AP12
WVDEP-DAQ Northern Panhandle Regional Office

INTERNATIONAL STEEL GROUP
ISG WEIRTON INC.

400 THREE SPRINGS DRIVE
WEIRTON, WV 26062

January 9, 2006

Mr. John A. Benedict, Director
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street, S.E.
Charleston, West Virginia 25304

Subject: ISG Weirton Inc. Request for 1-Year Extension of Compliance and Performance Test Deadlines for Basic Oxygen Process (BOP) Scrubber, BOP Roof Monitor and BOP Hot Metal Transfer Baghouse, Blast Furnace Casthouse Baghouse, Desulfurization Baghouse and other Requirements pertaining to the National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Final Rules

Dear Mr. Benedict:

ISG Weirton Inc. is submitting this request for a 1-year extension of compliance to the West Virginia Department of Environmental Protection (WVDEP) in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) General Provisions at 40 CFR 63.6(i)(4)(i)(A). This request relates to the NESHAP for Integrated Iron and Steel Manufacturing final rule at 40 CFR 63, Subpart FFFFF. More specifically, 40 CFR 63.7783(a) requires compliance with each emission limitation and operation and maintenance requirement of the subpart by no later than May 22, 2006. However, the NESHAP general provisions allow a source to request from the State up to one additional year to comply with the standard if such additional period is necessary for the installation of controls. The general provisions direct the State to revise the source's Title V permit (pending) to incorporate the conditions of the extension of compliance.

This request for an extension of compliance has been submitted in accordance with 40 CFR 63.6(i)(4)(i)(B) which requires submittal to the appropriate authorities no later than 120 days prior to the affected source's compliance date. The compliance extension request provides the necessary information required by 40 CFR 63.6(i)(6)(i), along with other background information that will assist WVDEP in evaluating this extension request. Depending upon the timing of resuming steelmaking operations at the facility, ISG Weirton may also request an additional compliance schedule extension in a subsequent submittal pursuant to the provisions of 40 CFR 63.6(i)(4)(ii) which allows a compliance extension of up to 2 years after the standard's effective date to comply with the standard.

ISG Weirton Ironmaking and Steelmaking Operations Have Been Idled

Ironmaking and steelmaking operations at the ISG Weirton Inc. facility have been shut down due to market demands. ISG Weirton hopes to resume ironmaking and steelmaking operations in the future, and has carefully "mothballed" equipment to preserve its value for future use. Maintenance activities and other items are being performed as needed on the equipment so that it is maintained in good working order for potential re-start. As such, the ISG Weirton facility's shutdown is only temporary, and the plant will be considered and regulated as an existing source if and when the ironmaking and steelmaking operations are resumed.

ISG Weirton Integrated Iron and Steel MACT Program Requirements and Issues

We understand that currently the available supply for steel is in excess of the demand. Due to the recent acquisition and incorporation of the ISG facilities into Mittal Steel USA, Inc. management personnel concluded that certain steelmaking facilities within the Mittal Steel USA organization would need to curtail production of steel. The management personnel concluded that the Weirton facility should be shut down, and the shut down was expected to last for a few months. The steelmaking operations at the Basic Oxygen Plant shut down on June 16th. Unfortunately, the demand continues to be slower than desired, and the shut down duration was later extended from the originally planned date (for resuming steelmaking operations during September 2005). To manage costs, the ISG Weirton facility has laid off many of the "hot end" personnel during this period, which has severely limited our ability to effectively implement the Integrated Iron and Steel MACT (II&S MACT) requirements during this period. Furthermore, the somewhat uncertain future regarding the precise timing of ironmaking and steelmaking resumption has complicated funding requests for expenditures related to the Iron and Steel MACT.

Due to Weirton's hot-end idle status we will need to request an extension of the II&S MACT compliance date. Because the hot-end was idled during the early stages of the II&S MACT source assessment/implementation, the facility will need additional time after re-start to complete the assessment and implement the remaining requirements. Many critical MACT implementation tasks cannot be effectively completed unless the sources are operating (e.g., testing to determine operating scenarios and parametric monitoring ranges, installation/troubleshooting of monitoring systems, training operators and developing Plans because critical personnel are on layoff). Having the MACT effective immediately upon re-start is not practical due to the extensive amount of operational monitoring and related preparation that is necessary to be 100% compliant. Furthermore, during the temporary idle period it will be impossible to demonstrate compliance with certain requirements (e.g., testing, etc.). For these reasons it is necessary to request additional time after the hoped for re-start of steelmaking operations.

Preliminary evaluations conducted by the ISG Weirton facility in preparation for the II&S MACT suggested that the sources should meet the applicable emissions limitations. Nevertheless, refinement of the operating parameters and diagnostic testing will be needed to ensure that the facility is able to consistently operate in compliance with the II&S MACT requirements.

Proposed ISG Weirton Compliance Schedule for Iron and Steel MACT Requirements

Due to the above described issues, ISG Weirton will not be able to meet the May 22, 2006 compliance deadline specified in the Iron and Steel Manufacturing MACT rule. ISG Weirton proposes the following schedule of critical milestones during the one-year extension to ensure progress toward compliance if steelmaking operations are resumed at the facility.

BOP Scrubber Control Systems and Roof Monitors

Significant design and installation/calibration of emission control and process variable monitoring equipment.

Design Engineering, Mechanical Engineering, Electrical Engineering, Drawings, Contract Bidding, Installation and Testing of Equipment	December 2005-September 2006
Initiate on-site Construction	September 2006
Complete On-Site Construction and Testing	May 7, 2007
Extended Compliance Deadline	May 22, 2007
Initial Performance Test	Within 180 days (on or before November 22, 2007)

Blast Furnace Cast House Roof Monitor and Baghouse

Significant design and installation/calibration of emission control and process variable monitoring equipment.

Design Engineering, Mechanical Engineering, Electrical Engineering, Drawings, Contract Bidding, Installation and Testing of Equipment	December 2005-October 2006
Initiate on-site Construction	October 2006
Complete On-Site Construction and Testing	May 14, 2007
Extended Compliance Deadline	May 22, 2007
Initial Performance Test	Within 180 days (on or before November 22, 2007)

BOP Desulfurization Baghouse and Hot Metal Transfer Baghouse

Significant design and installation/calibration of emission control monitoring equipment.

Design Engineering, Mechanical Engineering, Electrical Engineering, Drawings, Contract Bidding, Installation and Testing of Equipment	December 2005-October 2006
Initiate on-site Construction	October 2006
Complete On-Site Construction and Testing	May 14, 2007
Extended Compliance Deadline	May 22, 2007
Initial Performance Test	Within 180 days (on or before November 22, 2007)

ISG Weirton is making this formal request for a 1-year extension of the compliance deadline for all Iron and Steel NESHAP requirements from May 22, 2006 to May 22, 2007. This should also extend all subsequent deadlines in the Iron and Steel MACT by one year. For instance, the performance test obligations should now be required within 180 days of May 22, 2007.

If you have any questions on this matter, please call either Paul Tomiczek at (304) 797-4276 or Clark Francy at (304) 797-3908. We appreciate your time and consideration of this MACT compliance schedule extension request.

Sincerely,

Brian James
Plant Manager, ISG Weirton Inc.

cc. EPA Region III, Office of Enforcement and Compliance Assurance
Paul Tomiczek, ISG Weirton Inc.
Clark Francy, ISG Weirton Inc.
Keith Nagel, Mittal Steel USA, Inc.
Mike Long, Mittal Steel USA, Inc.
Harry Littlecott, ISG Weirton Inc.
Ed Vescovi, ISG Weirton Inc.