

Texas Commission on Environmental Quality
Form OP-UA36
Steel Plant Unit Attributes

General:

This form is used to provide a description and data pertaining to all electric arc furnaces (EAFs), dust-handling systems, argon-oxygen decarburization (AOD) vessels, and shops located at steel plants that produce carbon, alloy, or specialty steels with potentially applicable requirements associated with a particular regulated entity number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to an EAF, dust-handling system, AOD vessel, or a shop located at a steel plant, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

Tables 1a - 1b: **Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**
 Subpart AA: Standards of Performance for Steel Plants

Tables 2a - 2b: **Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**
 Subpart AAa: Standards of Performance for Steel Plants

Tables 3: **Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**
 Subpart YYYYY: National Emission Standards for Hazardous Air Pollutants from Electric Arc Furnace Steelmaking Facilities

The Texas Commission on Environmental Quality (TCEQ) regulated entity number (RNXXXXXXXXXX) and the application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). **Leave the permit number blank for the initial form submittal.** If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the regulated entity number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. **Anytime a response is not required based on the qualification criteria, leave the space on the form blank.**

Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency Administrator before the federal operating permit application is submitted.

The Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: The Regulated Entity and Customer Reference Numbers have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ which maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as “core data.” The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: The Customer Reference (CN) number and the Regulated Entity (RN) number.

The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ website at www.tceq.texas.gov/permitting/central_registry.

Specific:

Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart AA: Standards of Performance for Steel Plants

- ★ **Complete only for EAFs and dust-handling systems that commenced construction, modification, or reconstruction on or before August 17, 1983, or shops containing these facilities, located at steel plants producing carbon, alloy, or specialty steels**

Unit ID No.:

Enter the identification number (ID No.) for the EAF, shop, or dust handling system (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:

Site operating permit (SOP) applicants should indicate the SOP Index Number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP Index Numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Facility Type:

Select one of the following options for the facility located at the steel plant. Enter the code on the form.

Code	Description
EAF	Electric arc furnace
DUST	Dust handling equipment or system
SHOP	Shop housing facilities subject to 40 CFR Part 60, Subpart AA

Construction/Modification Date:

Select one of the following options that best describes the date of commencement of the affected facility's most recent construction, reconstruction, or modification. Enter the code on the form.

Code	Description
74-	On or before October 21, 1974
74-83	After October 21, 1974 and on or before August 17, 1983

- ▼ **Continue only if "Construction/Modification Date" is "74-83" and "Facility Type" is "EAF" or "SHOP".**

- ★ **Complete "Shop Additional Emissions" only if "Facility Type" is "SHOP."**

Shop Additional Emissions:

Enter "YES" if emissions from an electric arc furnace system are combined with emissions from facilities not subject to 40 CFR Part 60, Subpart AA. Otherwise, enter "NO."

Capture System:

Enter "YES" if the capture system is designed and operated to capture and duct all emissions to a control device. Otherwise, enter "NO."

- ★ **Complete "Alternate Method of Documentation" only if "Facility Type" is "EAF" and "Capture System" is "NO."**

Alternate Method of Documentation (AMOD):

Enter “YES” if an alternative method of providing a continuous record of operation of the capture system has been approved. Otherwise, enter “NO.”

★ **Complete “AMOD ID No.” only if “Alternate Method of Documentation” is “YES.”**

AMOD ID No.:

If an AMOD has been approved, then enter the corresponding AMOD unique identifier for each unit or process. If the unique identifier is unavailable, then enter the date of the AMOD approval letter. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

★ **Complete “Direct Shell Evacuation Control System” only if:**

“Facility Type” is “SHOP,” or

“Facility Type” is “EAF” and “Alternate Method of Documentation” is “NO.”

Direct Shell Evacuation Control System:

Enter “YES” if emissions from an electric arc furnace system are controlled by a direct shell evacuation control (DEC) system. Otherwise, enter “NO.”

★ **Complete “Shop Opacity Observations” only if “Direct Shell Evacuation Control System” is “YES.”**

Shop Opacity Observations:

Enter “YES” if shop opacity observations are performed as specified in 40 CFR § 60.273(d). Otherwise, enter “NO.”

▼ **Continue only if “Facility Type” is “EAF.”**

**Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AA: Standards of Performance for Steel Plants**

Unit ID No.:

Enter the identification number (ID No.) for the EAF, (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:

Site operating permit (SOP) applicants should indicate the SOP Index Number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP Index Numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Filter Type:

Select the option that describes the type of fabric filter used to control emission from the EAF. Enter the code on the form.

Code	Description
MULT	Modular, multiple stack, negative-pressure or positive-pressure fabric filter.
SINGLE	Single stack fabric filter
OTHER	Fabric filter other than those above or no fabric filter

★ **Complete “Opacity” only if “Filter Control” is “MULT” or “SINGLE.”**

Opacity:

Enter “YES” if opacity is determined by a certified visible emissions observer. Otherwise, enter “NO.”

Multiple Control Devices:

Enter “YES” if emissions from the EAF are fed to more than one control device. Otherwise, enter “NO.”

EAF Additional Emissions:

Enter “YES” if emissions from the EAF are combined with emissions from facilities not subject to 40 CFR Part 60, Subpart AA to feed a common capture/control system. Otherwise, enter “NO”

★ **Complete “Test Procedures” only if “EAF Additional Emissions” is “YES.”**

Test Procedures:

Select one of the following options for the procedures used during the performance test. Enter the code on the form.

Code	Description
COMB	Base compliance only on control of the combined emissions
AMOT	Only using a method acceptable to the Administrator that compensates for the emissions from non-subject facilities
BOTH	Using a combination of checking compliance by an alternate method and based on control of combined emissions

★ **Complete “AMOT ID No.” only if “Test Procedures” is “AMOT” or “BOTH.”**

AMOT ID No.:

Enter the alternate means of testing (AMOT) unique identifier. If the unique identifier is unavailable, then enter the date of the AMOT approval letter. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

**Table 2a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AAa: Standards of Performance for Steel Plants**

★ **Complete only for EAFs, dust-handling systems, and argon-oxygen decarburization (AOD) vessels that commenced construction, modification, or reconstruction after August 17, 1983, or shops containing these facilities, located at steel plants producing carbon, alloy, or specialty steels.**

Unit ID No.:

Enter the identification number (ID No.) for the EAF, AOD vessel, shop, or dust handling system (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:

Site operating permit (SOP) applicants should indicate the SOP Index Number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP Index Numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Facility Type:

Select one of the following options for the facility located at the steel plant. Enter the code on the form.

Code	Description
EAF	Electric arc furnace
AOD	Argon-oxygen decarburization vessel
DUST	Dust handling equipment/system
SHOP	Shop housing facilities subject to 40 CFR Part 60, Subpart AAa

▼ **Continue only if “Facility Type” is “EAF,” “AOD” or “SHOP.”**

Shop Opacity Observations:

Enter “YES” if shop opacity observations are performed as specified in 40 CFR § 60.273a(d). Otherwise, enter “NO.”

★ **Complete “Shop Additional Emissions” only if “Facility Type” is “SHOP.”**

Shop Additional Emissions:

Enter “YES” if there are any emissions from EAFs or AOD vessels that are combined with emissions from facilities not subject to 40 CFR Part 60, Subpart AAa to feed a common capture/control system. Otherwise, enter “NO.”

▼ **Continue only if “Facility Type” is “EAF” or “AOD.”**

Alternative Method of Documentation (AMOD):

Enter “YES” if the Administrator has approved an alternative to monthly operational status inspections that will provide a continuous record of the operation of the emission capture system. Otherwise, enter “NO.”

★ **Complete “AMOD ID No.” only if “Alternate Method of Documentation” is “YES.”**

AMOD ID No.:

If an AMOD has been approved, then enter the corresponding AMOD unique identifier for each unit or process. If the unique identifier is unavailable, then enter the date of the AMOD approval letter. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

★ **Complete “Inspections as Specified in 40 CFR § 60.274a(d)” only if “Alternate Method of Documentation” is “NO.”**

Inspections as Specified in 40 CFR § 60.274a(d):

Enter “YES” if inspections are performed as specified in 40 CFR § 60.274a(d). Otherwise, enter “NO.”

**Table 2b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AAa: Standards of Performance for Steel Plants**

Unit ID No.:

Enter the identification number (ID No.) for the EAF, or AOD vessel (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:

Site operating permit (SOP) applicants should indicate the SOP Index Number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP Index Numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Multiple Control Devices:

Enter “YES” if emissions from the EAF are fed to more than one control device. Otherwise, enter “NO.”

EAF Additional Emissions:

Enter “YES” if emissions from the EAF or AOD vessel are combined with emissions from facilities not subject to 40 CFR Part 60, Subpart AAa to feed a common capture/control system. Otherwise, enter “NO.”

★ **Complete “Test Procedures” only if “EAF Additional Emissions” is “YES.”**

Test Procedures:

Select one of the following options for the procedures used during the performance test. Enter the code on the form.

Code	Description
COMB	Only basing compliance on control of the combined emissions
AMOT	Only using a method acceptable by the administrator that compensates for the emissions from non-subject facilities
BOTH	Using a combination of checking compliance by an alternate method and based on control of combined emissions

★ **Complete “AMOT ID No.” only if “Test Procedures” is “AMOT” or “BOTH.”**

AMOT ID NO.:

Enter the AMOT unique identifier. If the unique identifier is unavailable, then enter the date of the AMOT approval letter. The unique identifier and/or the date of the approval letter are contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

Filter Type:

Select the option that describes the type of fabric filter used to control emission from the EAF. Enter the code on the form.

Code	Description
MULT	Modular, multiple stack, negative-pressure or positive-pressure fabric filter.
SINGLE	Single stack fabric filter
OTHER	Fabric filter other than those above or no fabric filter

★ **Complete “Opacity” only if “Filter Control” is “MULT” or “SINGLE”**

Opacity:

Enter “YES” if opacity is determined by a certified visible emissions observer. Otherwise, enter “NO.”

**Table 3: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart YYYYYY: National Emission Standards for Hazardous Air Pollutants from Electric Arc Furnace Steelmaking Facilities**

Note: The removal of mercury switches from automotive scrap as well as general scrap handling requirements are addressed in the MACT YYYYYY portion of Form OP-REQ1. The following questions pertaining to MACT YYYYYY are for the control of particulate matter (PM) emissions and PM (Opacity) due to the operation of the electric arc furnace or argon-oxygen decarburization vessels.

★ **Complete only for electric arc furnaces (EAF) steelmaking facilities, dust-handling systems, and argon oxygen decarburization (AOD) vessels that are area sources of hazardous air pollutants.**

Unit ID No.:

Enter the identification number (ID No.) for the EAF, AOD vessel, shop, or dust handling system (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:

Site operating permit (SOP) applicants should indicate the SOP Index Number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP Index Numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Facility Type:

Select one of the following options for the facility located at the steel plant. Enter the code on the form.

Code	Description
RD	Research and Development
EAF	Electric arc furnace
AOD	Argon-oxygen decarburization vessel
SHOP	Melt Shop

Production Capacity:

Select one of the following options for the production capacity of the new or existing affected source.

Code	Description
150+	EAF is a large steelmaking facility producing greater than 150,000 tons per year (tpy) of steel
150-	EAF is a small steelmaking facility producing less than 150,000 tpy of stainless or specialty steel

- ★ **Complete “Small Facility Emission Limit” only if “Production Capacity” is “150-”, and “Facility Type” is not “SHOP”.**

Small Facility Emission Limit:

Select one of the following options for the emission limit of the new or existing affected source.

Code	Description
LBTON	Facility is complying with a particulate matter (PM) emission limit in lb/ton.
GRDSCF	Facility is complying with a particulate matter (PM) emission limit in gr/dscf.

Performance Testing:

Select one of the following options for the emission limit of the new or existing affected source.

Code	Description
PREVTEST	A previous performance test as outlined in 63.10686(d)(6) is being used to demonstrate compliance with the applicable emission limit.
INITEST	An initial performance test as outlined in 63.10686(d) is being used to demonstrate compliance with the applicable emission limit.

Multiple Control Devices:

Select one of the following options for the routing of the EAF/AOD emissions to the control device(s).

Code	Description
SINGCD	Emissions from the EAF/AOD are fed to a single control device.
MULTICD	Emissions from the EAF/AOD are fed to multiple control devices.

EAF Additional Emissions:

Select one of the following options if emissions from the EAF, AOD, or SHOP are combined with other sources in a common capture/control system.

Code	Description
NOADD	Emissions are not combined with additional sources.
ADDEM	Emissions are combined with additional sources.

- ★ **Complete “Test Procedures” only if “EAF Additional Emissions” is “ADDEM.”**

Test Procedures:

Select one of the following options for the procedures used during the performance test. Enter the code on the form.

Code	Description
COMB	Only basing compliance on control of the combined emissions
AMOT	Only using a method acceptable by the administrator that compensates for the emissions from non-subject facilities
BOTH	Using a combination of checking compliance by an alternate method and based on control of combined emissions

Texas Commission on Environmental Quality
Steel Plant Attributes
Form OP-UA36 (Page 1)
Federal Operating Permit Program
Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AA: Standards of Performance for Steel Plants

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Facility Type	Construction/Modification Date	Shop Additional Emissions	Capture System	AMOD	AMOD ID No.	Direct Shell Evacuation Control System	Shop Opacity Observations

Texas Commission on Environmental Quality
Steel Plant Attributes
Form OP-UA36 (Page 2)
Federal Operating Permit Program
Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AA: Standards of Performance for Steel Plants

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Filter Type	Opacity	Multiple	EAF Additional Emissions	Test Procedures	AMOT ID No.

**Texas Commission on Environmental Quality
Steel Plant Attributes
Form OP-UA36 (Page 3)
Federal Operating Permit Program
Table 2a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AAa: Standards of Performance for Steel Plants**

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Facility Type	Shop Opacity Observations	Shop Additional Emissions	AMOD	AMOD ID No.	Inspections as Specified in 40 CFR § 60.274a(d)

**Texas Commission on Environmental Quality
Steel Plant Attributes
Form OP-UA36 (Page 4)
Federal Operating Permit Program
Table 2b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart AAa: Standards of Performance for Steel Plants**

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Multiple Control Device	EAF Additional Emissions	Test Procedures	AMOT ID No.	Filter Type	Opacity

Texas Commission on Environmental Quality

Steel Plant Attributes

Form OP-UA36 (Page 5)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart YYYYYY: National Emission Standards for Hazardous Air Pollutants from Electric Arc Furnace Steelmaking Facilities

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Facility Type	Production Capacity	Small Facility Emission Limit	Performance Testing	Multiple Control Devices	EAF Additional Emissions	Test Procedures