

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

The unit attributes (OP-UA) forms are used to provide a description and data pertaining to all emission units, emission points, processes and control devices with potentially applicable requirements associated with a particular regulated entity (RN) number and application. The information will be provided in an excel format. Each OP-UA form will include sheets for General Information, a Table of Contents, OP-SUM, OP-REQ2, and the unit attribute tables. The individual unit summary (OP-SUM) information and the negative applicable/superseded requirement determinations (OP-REQ2) will be provided on each individual OP-UA form for the applicable units identified in the unit attribute tables.

General Information Sheet

The General Information sheet holds the permit information. The following permit application information is requested for the site:

Date:

Enter the date the application is being submitted by the applicant to TCEQ (MM/DD/YYYY). Any subsequent submittals must show the date of revision.

Customer Reference No. (CN):

Enter the customer reference number (CNXXXXXXXXXX). This number is issued by TCEQ as part of the central registry process. If a customer reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.

Regulated Entity No. (RN):

Enter the regulated entity reference number for the site (RNXXXXXXXXXX). This number is issued by TCEQ as part of the central registry process. If a regulated entity reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.

Permit No.:

Enter the permit number assigned by TCEQ. Leave the permit number blank if a permit number has not been assigned.

Permit Area Name:

Enter the name of the application area (maximum 50 characters). This should be the same name provided on Form OP-1 (Site Information Summary).

Permit Type:

Choose the type of permit for which this application is being submitted from the dropdown menu (SOP, GOP, TOP).

Information on the different permit types can be found on TCEQ's website at:

www.tceq.texas.gov/permitting/air/titlev/permit_types.html.

Project Type:

Choose the project type for which this application is being submitted from the dropdown menu (Initial, Revision, Renewal).

Submission Type:

Choose the submission type for which this form is being submitted from the dropdown menu (New Application, Existing Application Update).

Project Number:

Enter the project number assigned by TCEQ. Leave the project number blank if a project number has not been assigned.

Title V Form Release Date, Form Number, APD ID Number, and Version Revised Date are present and cannot be altered.

Table of Contents Sheet

The Table of Contents lists all the sheets in the UA Form. If information is submitted on the OP-SUM, OP-REQ2 or the Unit Attribute tables, the "Data Submitted" column will display a "Yes". If no information is submitted, the "Data Submitted" column will remain blank. The Table of Contents information is auto populated. Applicants will not need to submit any information in the Table of Contents.

Instructions for OP-SUM Sheet

General:

All units with one or more potentially applicable requirements addressed in this form must be identified on the OP-SUM sheet. The term "unit" in these instructions has the meaning of "emission unit" as defined in 30 TAC Chapter 122.

The purpose of this sheet is to list individual units addressed in the Federal Operating Permit (FOP) application and to provide identifying information and preconstruction authorizations. This form is also used to designate members of groups.

The corresponding preconstruction authorization for each unit must also be listed on this form. For units which were authorized to construct or modify under Permits by Rule (PBR), list all applicable PBR information, including registration numbers. If a unit is authorized under more than one preconstruction authorization, then list all applicable preconstruction authorizations, including any Prevention of Significant Deterioration (PSD) and/or nonattainment permit(s).

Groups:

- A "group" is a collection of units or devices that have identical applicability (or non-applicability) determinations and may, or may not, have a physical relationship.
 - Group members may have different 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations.
 - Groups may be used on UA forms only if all unit attributes are identical.
 - All groups must be mutually exclusive. Units cannot be listed in more than one group on a given UA form.
 - Grouping is optional.
 - Groups are assigned an ID No. by the applicant, which must begin with the prefix "GRP" followed by a maximum of eleven characters (GRPXXXXXXX).
-

Specific

Table 1

Unit Action Indicator (Unit AI):

Complete this section only for a permit revision or renewal. Select "A" from the dropdown menu if the emission unit indicated is an addition to the existing permit. Select "D" from the dropdown menu if the existing emission unit indicated is being deleted from the permit. If an emission unit is not being added/deleted from the permit, leave blank.

Revision No.:

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision. If no changes are made to an existing unit in the permit, leave blank.

Unit ID No.:

Each unit must be assigned an identification number. (Maximum 14 characters)

- For emission units with potentially applicable requirements, enter Facility ID Nos. (FINs) as listed in the TCEQ State of Texas Air Reporting System (STARS).
- If FIN currently does not exist in STARS, then a new ID No. that is consistent with the existing numbering system must be provided by the applicant. Unit ID Nos. cannot begin with “GRP” (the character sequence reserved for Group ID Nos.).

Group ID No.:

If applicable, enter the unique identification number for the group which includes this unit (GRPXXXXXX) (“GRP” followed by a maximum of 11 characters). If the unit is not a member of a group, leave this column blank. (See general instructions, above, for information regarding requirements for grouping units in FOP applications.)

Unit Name/Description:

Each unit must be given a name or description that distinguishes it from other units as much as practicable. The Unit Name/Description should clearly indicate the type of unit. If possible, please avoid using generic descriptions, such as “Tank” or “Boiler,” for multiple units. (Maximum 50 characters)

- Enter a text name or description for the unit from STARS whenever possible.
- If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

Example: The following example is intended as guidance on completion of columns on OP-SUM. It should be assumed that all criteria for inclusion in the application are met. Criteria for grouping are also assumed to be satisfied.

Unit ID No.	Group ID No.	Unit Name/Description	
B-1	GRP-BOILER	Boiler 1	
B-2	GRP-BOILER	Boiler 2	
T-3		Tank 3	
T-4		Tank 4	

CAM (For reference only):

Indicate if the unit is subject to 40 CFR Part 64 by selecting “Y” from the dropdown menu in the “CAM” column next to the unit. Please refer to 40 CFR Part 64 to determine applicability. *Certification by the Responsible Official (RO) pursuant to 30 TAC § 122.165 does not extend to the information which is designated on forms as “For reference only.”*

Preconstruction Authorizations (PCA):

At least one PCA must be indicated for each unit; however, a unit may have multiple authorizations. *All preconstruction authorizations listed on this form must also be identified on Form OP-REQ1.*

When a unit has multiple authorizations, each PCA must be listed in a separate row.

The following examples are intended as guidance on completion of columns for the preconstruction authorizations. The examples are followed by specific instructions for each column.

Example 1: Adding multiple PCA Categories for a unit

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
A		Flare1		Diamine Flare	Y	A	NSR Permit	1234		
A		Flare1		Diamine Flare	Y	A	PSD	PSDTX1234		
A		Flare1		Diamine Flare	Y	A	PBR	23456, 34567	106.261	11/01/2003
A		Flare1		Diamine Flare	Y	A	PBR	23456, 34567	106.262	11/01/2003

Example 2: Adding and deleting a PCA for a unit

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
		T-3	GRPTANKS	Tank 3		A	Standard Permit	12345		
		T-3	GRPTANKS	Tank 3		D	PBR		106.432	09/04/2000

Preconstruction Authorization Action Indicator (PCA AI):

Select “A” from the dropdown menu if a preconstruction authorization is being added for the emission unit. Select “D” from the dropdown menu if a preconstruction authorization is being deleted from the emission unit. If a preconstruction authorization is not being added/deleted from the emission unit, leave blank.

Preconstruction Authorization (PCA) Category:

Select from the dropdown menu the category of the PCA being added or deleted.

- PBR - Permit by Rule claimed or registered under 30 TAC Chapter 106
- Standard Permit - 30 TAC Chapter 116 and non-rule Air Quality Standard Permits
- NSR Permit - 30 TAC Chapter 116 preconstruction authorizations
- PSD - Prevention of Significant Deterioration Permits
- Nonattainment - Nonattainment Permits
- GHG – Greenhouse Gas Permits
- 112(G) [HAP] - Hazardous Air Pollutant Permits
- MSW or IHW - Municipal Solid Waste or Industrial Hazardous Waste Permits
- Exemption – De Minimis Facilities or Sources authorized by 30 TAC Chapter 116, § 116.119

Authorization/Registration Number:

List all TCEQ permit numbers for 30 TAC Chapter 116 preconstruction authorizations, Title I preconstruction authorizations (PSD and nonattainment permits) and 30 TAC Chapter 106 (PBR) registration numbers, under which the unit is operating.

- **30 TAC Chapter 116 Permits:** Enter the TCEQ permit number, for example, 12345. This includes special permits and standard permit registrations.
- **Prevention of Significant Deterioration (PSD) Permit:** Enter the PSD permit number (PSDTXXXX), for example, PSDTX123. If the PSD permit has been modified, include the “M” suffix (PSDTXXXXMXX), for example, PSDTX123M5. *Title I authorizations should only be listed for units addressed by the PSD or nonattainment permits.*

- **Nonattainment Permit:** Enter each nonattainment permit number (NXXX), for example, N123. If the nonattainment permit has been modified, include the “M” suffix (NXXXMXX), for example, N123M5. *Title I authorizations should only be listed for units addressed by the PSD or nonattainment permits.*
- **Permit by Rule (previously Standard Exemption):** Enter the PBR Registration No. for each PBR registered under 30 TAC Chapter 106 and each standard exemption previously registered under 30 TAC Chapter 116.
- **Exemption:** Enter 116.119 for a de minimis facility or source, which has other potentially applicable or applicable requirements (these are authorized by 30 TAC Chapter 116, § 116.119). *De minimis facilities or sources should not be included if there are no other potentially applicable or applicable requirements.*

Permit by Rule (PBR) Number:

For each PBR claimed or registered under 30 TAC Chapter 106, and each standard exemption claimed or registered previously under 30 TAC Chapter 116, enter the number in the appropriate format shown below.

Note: All units authorized by PBR must also be identified on Form OP-PBRSUP.

Format	PBR/standard exemption claimed or registered date
106.XXX	Authorized on or after March 14, 1997 (except 106.181 is on or after December 27, 1996)
XXX	Authorized prior to March 14, 1997

XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number.

PBR Effective Date:

For each PBR claimed or registered under 30 TAC Chapter 106 and each standard exemption claimed or registered, enter the effective date of the rule. MM/DD/YYYY = *Effective date of the Standard Exemption or PBR in effect at the time claimed or granted. Information on version dates is available at:*

Information on Chapter 116 version dates is available at:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html.

Information on Chapter 106 version dates is available at:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html.

Please note that prior to March 14, 1997, a standard exemption list was incorporated by reference into 30 TAC Chapter 116 and each standard exemption had an assigned number, e.g., 112. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and now is referred to as a PBR.

(Standard exemptions were readopted under the PBR designation on March 14, 1997.) Information regarding PBRs may be found on the TCEQ website at <https://www.tceq.texas.gov/permitting/air/permitbyrule/air-pbr>.

The applicant has the option of claiming a newer and more stringent version of the standard exemption or PBR if the original applicable version of the standard exemption or PBR cannot easily be determined. As an example of a standard exemption authorized before March 14, 1997, Standard Exemption No. 6 had an effective date of August 30, 1988. It was then amended with a new effective date of July 20, 1992. The standard exemption identifier for a compressor engine constructed in 1993 and registered under Standard Exemption No. 6 would be represented as:

Permit By Rule (PBR) Number	PBR Effective Date
6	07/20/1992

As an example of a PBR authorized on or after March 14, 1997, Standard Exemption No. 6 had an effective date of June 7, 1996. It was then amended and moved to 30 TAC § 106.512 with an effective date of March 14, 1997. The PBR identifier for a compressor engine constructed in 1998 and registered under 30 TAC § 106.512 would be represented as:

Permit By Rule (PBR) Number	PBR Effective Date
106.512	03/14/1997

Instructions for OP-REQ2 Sheet

General:

The purpose of this sheet is to document negative applicability from potentially applicable requirements or to document duplicative, redundant, and or contradicting requirements that have been superseded by a more stringent or equivalent requirement for units when a permit shield is requested. Negative applicability or superseded requirement determinations when a permit shield is NOT requested may be documented on this sheet OR the appropriate unit attribute table.

A negative applicability determination is any regulatory citation that provides the basis whereby every operating condition of an emission unit is not subject to a regulation. For example, Title 40 Code of Federal Regulation § 60.110b(a) [40 CFR § 60.110b(a)] could be the regulatory basis for a negative applicability determination for a VOC storage tank of less than 75 cubic meters; therefore, the storage tank is completely exempt from 40 CFR Part 60, Subpart Kb.

Note: Numerous regulatory citations appear to authorize exemptions to qualifying units from those regulations. However, closer examination typically reveals that there are still some requirements which must still be met (such as monitoring and/or recordkeeping).

For certain emission units subject to certain 40 CFR Part 63 standards, other federal regulations may apply. In many instances one of the overlapping regulations may specify which rule supersedes the other. The regulation may state that the owner or operator only has to comply with a specific subpart after the compliance date or it may state that compliance with the subpart is deemed to be in or constitute compliance with other subparts. Although superseded rules do not qualify as negative applicability determinations, it has been determined that these instances can be documented on the OP-REQ2, if the applicant elects to comply only with the superseding requirement. For example, a Group 1 or Group 2 storage tank, subject to 40 CFR Part 63, Subpart G, may not be required to comply with 40 CFR Part 60, Subpart Kb due to rule overlap of 40 CFR Part 63, Subpart G. In this case, the permit applicant may request a permit shield from 40 CFR Part 60, Subpart Kb. In this case, the applicant must submit the superseding requirement citation, § 63.110(b), and a textual description of the superseding determination, if they elect to comply with only the superseding requirement.

When an emission unit has one or more potential applicable requirements, the applicant must list all the requirements for which negative applicability or superseded requirement determinations can be made. Once the negative applicability or superseded requirement determinations have been made, indicate the citation and reason for the non-applicability or superseded requirement in the appropriate columns. Indicate the determinations for all potentially applicable requirements for each emission unit before listing the next unit.

Negative applicability or superseded requirement determinations for potentially applicable requirements, confirmed by TCEQ, may be approved as a permit shield (see instructions outlined in Area Wide Applicability Determinations, Form OP-REQ1, to request a permit shield). If a permit shield is requested, the determinations are always required on the OP-REQ2 sheet. For additional information relating to permit shields, refer to the TCEQ guidance document entitled "Site Operating Permit (SOP) Permit Shield Guidance found on TCEQ's website at:

www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html.

Specific:

Fill out the OP-REQ2 sheet to provide a negative applicability determination for units included on this OP-UA form. If the unit is not submitted on an OP-UA form, submit the negative applicability determination on the standalone OP-REQ2 form.

Unit Action Indicator (AI):

Select "A" from the dropdown menu if the negative applicability or superseded requirement is an addition to the permit. Select "D" from the dropdown menu if the negative applicability or superseded requirement is being deleted from the permit. For revisions to existing negative applicability or superseded requirements in the permit, use the "D" indicator for the existing permit shield and the "A" indicator for the revised permit shield.

Revision No.:

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2 (only for revision items within the application). This number will link the specific negative applicable requirement determination to the appropriate revision.

Unit ID No.:

Select the identification number (ID No.) (maximum 14 characters) of the unit as listed on the OP-SUM sheet.

Potentially Applicable Regulatory Name:

Select the name of the potentially applicable requirement from the dropdown menu for which negative applicability or superseded requirement is being demonstrated. If the potentially applicable regulatory name is not found in the dropdown menu, enter it manually (maximum 50 characters).

Note: Permit shields cannot be granted for permit authorizations of any kind (i.e. - PSD, NSR permit, Acid Rain, etc.).

Negative Applicability or Superseded Requirement Citation:

Enter the citation of the paragraph of the rule that was used to determine negative applicability or superseded requirements. Provide the citation detail to the level of the paragraph allowing the exemption, exclusion, or non-applicability. If there is more than one citation for determining negative applicability or superseded requirements, select the most appropriate or the clearest (least likely to be misinterpreted). Negative applicability or superseded requirement determinations by the applicant are subject to auditing during the permit application review. The applicant must always indicate the negative applicability or superseded requirement citation on the OP-REQ2. For examples on the level of detail for citations, see table below (maximum 36 characters).

Example Applicable Regulatory Requirements*

Regulation	Potentially Applicable Regulatory Name (Input Format)	Negative Applicability or Superseded Requirement Citation (Input Format)
30 TAC Chapters 111, 112, 113, 115 and 117	Chapter 111	§ 111.XXX(x)(yy)(zz)
	Chapter 112	§ 112.XXX(x)(yy)(zz)
	Chapter 113	§ 113.XXX(x)(yy)(zz)
	Chapter 115, Storage of VOCs	§ 115.XXX(x)(yy)(zz)
	Chapter 117, ICI	§ 117.XXX(x)(yy)(zz)
40 CFR Part 60, Subparts, New Source Performance Standards (NSPS)	NSPS XXX	§ 60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts, National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	§ 61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts, NESHAP by source category, including hazardous organic (HON)	MACT XX	§ 63.XXX(x)(yy)(zz)

* This list is not intended to be exhaustive

Negative Applicability/Superseded Requirement Reason:

Enter a textual description indicating the reason for the negative applicability or superseded requirement determination. If a permit shield is requested, the textual description provided will be recreated as the *Basis of Determination* for the permit shield in the permit. The description may include rule text, rule preamble, or other text resulting from a historical rule interpretation, EPA applicability determination Index (ADI), or case law. Use multiple lines if necessary (maximum 250 characters).

OP-UA48 Form Unit Attribute Tables- Instructions**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 to 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 see the Completing FOP Applications – Additional Guidance on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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 Evaluation 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 see the Completing FOP Applications – Additional Guidance on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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 see the Completing FOP Applications – Additional Guidance on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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 see the Completing FOP Applications – Additional Guidance on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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 AA “Test Procedures” only if “EAF Additional Emissions” is “YES.” a 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 YYYYY: 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 see the Completing FOP Applications – Additional Guidance on the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/05)

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 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