DIVISION OF ENVIRONMENTAL PROTECTION
OFFICE OF AIR QUALITY
1558 Washington Street, East
Charleston, WV 25311-2599

Gaston Caperton
Governor

David C. Callaghan
Director

Laidley Eli McCoy
Deputy Director

WV DIVISION OF ENVIRONMENTAL PROTECTION
OFFICE OF AIR QUALITY
1558 Washington Street, East
Charleston, WV 25311

v.

CO-SIP-95-2

WEIRTON STEEL CORPORATION
c/o Mr. Gene Current
Director, Environmental Control
400 Three Springs Drive
Weirton, WV 26062

CONSENT ORDER

I. AUTHORITY

Under the authority and direction of the Code of West Virginia, Chapter 22, Article 5, Section 1 et seq., this Consent Order is hereby entered.

II. FINDINGS OF FACT

1. Weirton Steel Corporation, hereinafter referred to as the "Company," owns and operates an integrated steel-making facility in Weirton, Hancock County, West Virginia. Sulfur dioxide is emitted from numerous process and fuel burning sources at the facility including coal and oil fired boilers, oil-fired waste heat boilers at the Company's basic oxygen process furnaces, the sinter plant, slag granulator, and hot mill reheat furnaces.

2. In 1978 the New Manchester-Grant Magisterial District of Hancock County was designated by the United States Environmental Protection Agency (hereinafter referred to as the "EPA") as a nonattainment area with respect to the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide pursuant to Section 107 of the Clean Air Act as amended in 1977. The remaining portion of Hancock County, consisting of Clay and Butler Magisterial Districts, was designated by EPA as a nonattainment area for the sulfur dioxide NAAQS on December 21, 1993.

3. The New Manchester-Grant Magisterial District of Hancock County had not been redesignated to attainment on November 15, 1990 and, by operation of law, continued to be formally designated as a nonattainment area with respect to the sulfur dioxide NAAQS upon passage of the Clean Air Act Amendments of 1990.

4. By a letter of February 5, 1990 EPA notified West Virginia that EPA had found West Virginia's State Implementation Plan (SIP) substantially inadequate to attain and maintain the NAAQS for sulfur dioxide in Hancock County. West Virginia's SIP for sulfur dioxide is primarily contained within 45 CSR 10 - "To Prevent and Control Air Pollution From the Emission of Sulfur Oxides".

5. The results of numerous dispersion modeling analyses using EPA-approved models and procedures show that sulfur dioxide allowed to be emitted from the Weirton facility under 45 CSR 10 - "To Prevent and Control Air Pollution From the Emission of Sulfur Oxides" may violate or substantially contribute to projected violations of the NAAQS for sulfur dioxide within the New Manchester-Grant Magisterial District of Hancock County.

6. Under the requirements of W. Va. Code §22-5-1 et seq., and the federal Clean Air Act, as amended, the Office of Air Quality of the West Virginia Division of Environmental Protection (hereinafter referred to as the "OAQ") is required to develop and submit to EPA an expeditious plan to assure attainment and maintenance of the NAAQS for sulfur dioxide in the New Manchester-Grant Magisterial District of Hancock County.

7. The Company and the OAQ have developed and entered this Consent Order to establish sulfur dioxide emission control requirements applicable to the Company sufficient to prevent violations of the NAAQS for sulfur dioxide within the New Manchester-Grant Magisterial District. The Company and the OAQ recognize that existing studies must be concluded or additional studies undertaken to develop a sulfur dioxide emission control plan to assure attainment and maintenance of the sulfur dioxide NAAQS in areas of Hancock County outside of the New Manchester-Grant Magisterial District. The parties do recognize, however, that the implementation of this Consent Order should result in substantial reductions in the ambient concentrations of sulfur dioxide within areas of Hancock County outside of the New Manchester-Grant Magisterial District.

8. The OAQ shall submit this order upon entry to EPA and request its incorporation into the State Implementation Plan for the purpose of federal enforceability and to carry out OAQ's responsibility under the WV Code and federal Clean Air Act.

III. CONCLUSIONS OF LAW

1. The OAQ is the agency empowered and authorized to regulate and control pollution of the air in the State of West Virginia under the supervision of the Director of the Division of Environmental Protection as provided in W. Va. Code §22-5-1 et seq., and W. Va. Code §22-1-7(3).

2. The OAQ has acted in accordance with the W. Va. Code and the rules that it administers.

3. The OAQ has provided notice and opportunity for public comment and a hearing in accordance with the W. Va. Code and the federal Clean Air Act, as amended.

IV. COMPLIANCE PROGRAM

1. The Company agrees that it shall not operate any source of sulfur dioxide emissions unless such source is in compliance with the Code, terms of the this Consent Order, and any additional or more stringent provisions of 45 CSR 10 - "To Prevent and Control Air Pollution From the Emission of Sulfur Oxides".

EPA3GEN034852

2. The Company agrees that at all times, including periods of source start-up, shut down, and malfunction, that it will, to the extent practicable, maintain and operate all sources of sulfur dioxide emissions, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

3. On or before January 31, 1995 and thereafter, the Company agrees to comply with the following emission and operational limitations in addition to any other applicable limitations under 45CSR10:

A. Sulfur dioxide emissions from high pressure boilers 1, 2, 3, and 4 shall not individually exceed either 1.6 pounds per million British Thermal Units (BTU) of heat input or a maximum mass emission rate of 864 pounds per hour per individual boiler. No more than three of these fuel burning units shall be operated at any time. When burning coal, combustion gases from no more than two of the high pressure boilers (Nos. 1, 2, 3, and 4) shall be routed to the C and D scrubber systems. During any such periods in which C and D scrubbing systems are shut-down or malfunctioning, combustion gases shall be routed to the A and B scrubbing systems. Combustion gases from these boilers shall be discharged through the scrubbing systems at all times when either coal or a mixture of coal and fuel oil is burned.

B. Sulfur dioxide emissions from High Pressure Boiler No. 5 shall not exceed either 0.8 pounds per million BTU of heat input or 480 pounds per hour.

C. Sulfur dioxide emissions from the sinter plant shall not exceed 250 pounds per hour.

D. Sulfur dioxide emissions from the slag granulator shall not exceed 100 pounds per hour.

E. Sulfur dioxide emissions from the operation of the basic oxygen process waste heat boilers shall not exceed 300 pounds per hour. Combustion gases from the waste heat boilers shall discharge through the BOF scrubber during all boiler operating periods.

F. The Hot Mill Reheat Furnaces, Foster Wheeler Boilers and combustion sources at the Hydrochloric Acid Regeneration Plant, Continuous Annealing Facility, Jumbo Annealing Facility, and Blast Furnace Stoves, shall be operated only with blast furnace gas, mixed gas, or natural gas, thereby making SO2 emissions from these emission units negligible. NOTE: Mixed gas consists of a mixture of approximately 70% natural gas and 30% air.

G. The Company agrees to permanently shut down Low Pressure Boiler numbers LP1, LP2, LP3, LP4, and LP15.

V. COMPLIANCE TESTING/REQUIREMENTS

Compliance with the emission limitations of this Consent Order shall be based upon the averaging time and compliance determination methods established within this section. Except as provided in sub-paragraph V.1.G., compliance with this

EPA3GEN034853

Consent Order shall be based upon a twenty-four (24) hour block averaging period with the beginning time of each period beginning at 12:00 o'clock midnight on each day. Sampling and analysis and continuous emission monitoring in accordance with this section shall be completed on a 7 day per week basis.

1. High Pressure Boilers 1, 2, 3, 4 [scrubber stacks C and D (or A and B in an emergency)], BOP Waste Heat Boilers (Venturi Scrubber Stack), and No. 5 High Pressure Boiler:

A. Coal shall be sampled in accordance with applicable sampling methods established by the American Society for Testing and Materials, (ASTM) during all 24-hour periods (or portions thereof) in which coal is burned. Gross coal samples shall be reduced and prepared for analysis in accordance with applicable ASTM methods and analyzed in accordance with applicable ASTM analytical methods for sulfur content and heating value. The mass of coal fired shall be determined for each 24 hour period and this data shall be retained and used by the company for diagnostic purposes and for demonstration to OAQ of compliance with Section IV.3.A. during periods of CEM shut-downs or malfunctions. All such data shall be provided to the Director upon request.

B. Fuel oil sulfur content and heating value shall be determined in accordance with applicable ASTM sampling and analytical methods for each lot of fuel oil fired. The mass or volume of fuel oil fired in each boiler during each 24 hour period shall be measured and the fuel oil analyses and daily fuel oil consumption by each boiler shall be used to determine the potential sulfur dioxide emission rates from fuel oil combustion prior to any removal by a scrubber.

C. Daily sulfur dioxide emissions shall be calculated in accordance with the following:

(1) High Pressure Boilers 1, 2, 3, 4 [scrubber stacks C and D (or A and B in an emergency)]: Prior to March 31, 1996, mass emissions shall be determined by the use of a portable continuous emission monitoring system in the exhaust gases from High Pressure Boilers 1, 2, 3 and 4 discharging through scrubber systems C and D, or A and B. Sulfur dioxide concentration measurements must characterize all combustion gas streams discharging to the ambient air. Prior to March 31, 1996, the heat input to High Pressure Boilers 1, 2, 3 and 4 shall be determined using the steam balance method as described in WVDEP-OAQ Regulation 2A, Section 8, "Heat Input Data Measurements." On and after March 31, 1996, the company shall utilize either the flue gas analysis method or the fuel use method, as described in WVDEP-OAQ Regulation Series 2A, Section 8, "Heat Input Data Measurements," to determine the heat input. During any period of failure or malfunction of the continuous emission monitoring system the company shall demonstrate compliance with Section IV.3.A in accordance with Section V.1.C.(4).

(2) High Pressure Boiler No. 5 - Mass emissions and the emission rate in pounds per million Btu's of heat input shall be determined by the use of AP-42 emission factors using daily oil consumption, sulfur content, and heating value analyses determined in accordance with applicable ASTM methods as per Section V.1.B.

EPA3GEN034854

(3) BOP Waste Heat Boilers - Mass emissions shall be determined by the use of an emission factor based upon daily oil consumption and oil sulfur content. For daily compliance determinations starting on January 31, 1995, compliance must be demonstrated using the highest statistically valid emission factor (determined using ASTM E178-80 "Standard Practice for Dealing with Outlying Observations") obtained in six complete scrubber outlet tests (3 test runs per test) conducted prior to January 31, 1995, representing conditions during the firing of those fuel oils that will be used on and after January 31, 1995. Emissions tests shall be conducted on the waste heat boiler scrubber stacks semi-annually after January 31, 1995 to determine compliance and verify and update the emission factor used for daily compliance demonstrations.

(4) During any period in which continuous emission monitoring data is unavailable for determination of compliance with Section IV.3.A., daily sulfur dioxide emissions shall be determined using the highest statistically valid emission factor derived in accordance with this subparagraph in conjunction with the daily coal consumption and sulfur content of the coal used each day.

The emission factor to be applied shall be representative of the scrubbers in service, scrubber operating conditions, the coal characteristics (including coal seam, sulfur and ash analysis and heating value) and fuel oil characteristics for those periods in which the emission factor is used to calculate sulfur dioxide emissions. For sulfur dioxide emission determinations on and after January 31, 1995, the company shall use the highest emission factor determined for any 24-hour period from prior, concurrent measurements of sulfur dioxide emissions by the continuous emission monitoring system, daily coal and fuel oil usage, and sulfur contents of coal and fuel oil. Initially this emission factor shall have been derived from a daily computation of sulfur dioxide emissions measured by CEM and fuel monitoring between December 1, 1994 and January 31, 1995. The emission factor shall be re-evaluated and corrected as necessary on a calendar quarter basis or as required by changes in fuels used or changes in system operating parameters (including the scrubbing systems). The daily emission factor shall be determined by the following formula:

$$EF = \frac{CEM}{2(mc \times sc + mfx\ sf)}$$

Daily sulfur dioxide emissions shall be determined using the following formulas when CEM data are not available for such determinations:

$$ME = .083\ (mc \times sc + mf \times sf)EF$$

$$ER = 2{,}000{,}000\ \frac{(mc \times sc + mf \times sf)}{(mc \times HVc + mf \times HVf)}\ EF$$

EPA3GEN034855

where,

EF = Emission factor in units of: $\frac{\text{lb of } SO_2 \text{ emitted}}{\text{lb of potential } SO_2 \text{ created by combustion}}$

CEM = Mass emissions of sulfur dioxide in units of pounds per day as measured by the CEM system
ME = Mass emissions of sulfur dioxide, in pounds per hour
ER = Emission rate of sulfur dioxide, in pounds per million BTU
mc = Mass of coal fired within a 24-hour period, in pounds
sc = Sulfur content of mc expressed, in pounds of sulfur per pound of coal
mf = Mass of fuel oil fired within a 24-hour period, in pounds
sf = Sulfur content of mf expressed, in pounds of sulfur per pound of fuel oil
HVc = Heating value of mc in BTU/pound of coal
HVf = Heating value of mf in BTU/pound of fuel oil
EF = Emission factor determined in accordance with this sub-paragraph

D. During the emissions tests conducted to determine emission factors for the sinter plant and the BOP waste heat boilers in accordance with this section, the following scrubber operating parameters shall be recorded and this data shall be used to establish scrubber operating conditions for which daily monitoring and recordkeeping shall be implemented to continuously verify compliance with the requirements of this order:

Scrubber liquor (inlet) flow, (gpm)
Scrubber liquor (inlet) pH
Scrubber outlet (gas) temperature (°F)
Differential pressure across scrubber (ΔP in inches, water column)

The Company shall utilize the testing results obtained pursuant to this requirement to develop a range of scrubber operating parameters by July 31, 1995 which parameters are satisfactory to the Director. Once approved by the Director, the range of scrubber operating parameters will be attached to this Consent Order as Appendix A. Instrumentation shall be installed, calibrated, and maintained to record hourly the above parameters on and after January 31, 1995 at the BOP Waste Heat Boilers and on and after July 1, 1995 for the Sinter Plant.

E. On and after March 31, 1996 the Company shall have installed and shall calibrate, maintain, and operate a permanent continuous emission monitoring system to measure the concentration of sulfur dioxide and oxygen in the exhaust gases from High Pressure Boilers 1, 2, 3, and 4 discharging through scrubber systems C and D. In the event that A and B scrubbers must be placed into service, a portable continuous sulfur dioxide emissions monitor as described in Section V.1.C.(1), shall be used to determine daily compliance with Section IV.3.A. For any periods during which these continuous emission monitors are not in service and properly functioning, sulfur dioxide emissions shall be determined in accordance with Sections V.1.A., V.1.B, and V.1.C.(4).

EPA3GEN034856

F. Installation, calibration, maintenance and operation of the continuous emission monitoring systems required under the provisions of this Consent Order shall comply with the following provisions under 40 CFR Part 60:

a. Part 60.13(a)
b. Part 60.13(d)(1)
c. Part 60.13(e)(2)
d. Part 60.13(f)
e. Part 60.13(g)
f. Part 60.13(h)
g. Part 60.13(i)
h. Part 60.13(j)
i. Part 60.45(c)
j. Part 60.45(e)
k. Part 60.45(f)
l. Part 60.46(b)(4)
m. Part 60, Appendix A, Methods 6, 6A, 6B and 6C
n. Part 60, Appendix B, Performance Specification 2
p. Part 60, Appendix B, Performance Specification 3

Where the term "administrator" is used within any of the referenced 40 CFR Part 60 provisions, the term shall mean the Director. All data required to be collected shall be quality assured in accordance with 40 CFR Part 60, Appendix F, Quality Assurance Procedures.

G. On and after December 1, 1996, compliance with the emission limitation of Section IV.3.A. shall be based upon a rolling 3 hour average.

2. Sinter Plant

A. Compliance with sub-paragraph IV.3.C. shall be demonstrated on a continuous basis in the manner set forth in V.1.C(4) except that the Company shall use applicable ASTM methods to daily sample and analyze the sulfur content of coke breeze and shall accurately measure the amount of coke breeze used during each established 24-hour period. The emission factor to be used to calculate sulfur dioxide emissions shall be based upon coke breeze consumption and sulfur content and shall be determined initially based upon a minimum of six sulfur dioxide emissions tests (3 runs per test) on both scrubber systems concluded prior to January 31, 1995 and shall be updated as necessary based upon subsequent required testing. The maximum statistically valid emission factor determined from any test shall be used to determine daily compliance in accordance with the methods outlined in Section V.1.C.(4).

B. The sinter plant scrubber stacks shall be tested semi-annually after January 31, 1995 to demonstrate compliance and to verify the accuracy of the sulfur dioxide emission factor used in the daily compliance demonstration.

C. Any emissions test characterizing sulfur dioxide emissions from the sinter plant for any two-hour period in excess of 2000 ppm shall be deemed to represent a violation of 45CSR10 and this Consent Order.

EPA3GEN034857

3. Slag Granulator

A. The Company shall conduct and submit the results of at least three sulfur dioxide emissions tests (3 runs per test) on the slag granulator to demonstrate compliance by January 31, 1995. Compliance tests shall be conducted and submitted to the OAQ semi-annually after January 31, 1995.

B. Any emissions test characterizing sulfur dioxide emissions from the slag granulator for any two-hour period in excess of 2000 ppm shall be deemed to represent a violation of 45CSR10 and this Consent Order.

4. Compliance testing and scrubber efficiency testing required under this Consent Order shall be in accordance with the following:

A. Reference test procedures in 40 CFR 60 Appendix A, specifically Methods 6, 6A, 6B, 6C, and 19 shall be employed.

B. After January 31, 1995, the Company shall be required to submit a test protocol to the Director for approval at least thirty (30) days prior to the projected for tests required under this consent order. Test protocols for all tests required prior to January 31, 1995, under the terms of this Consent Order, shall be submitted to the Director on or before December 9, 1995, and the Director shall review and approve or specify necessary revisions to these test protocols within ten (10) days of receipt. The Director shall be provided written notice of the actual test dates after approval of any test protocol, but not less than fifteen (15) days prior to the first date of testing.

C. Semi-annual tests required by this Consent Order must be conducted at approximately 6 month intervals with the test reports submitted to the Director by July 1 and January 1 each year starting in 1995.

D. Each test run conducted on the Sinter Plant and Slag Granulator must consist of four samples characterizing a two-hour period. The result of a test run shall be the arithmetic average of the four samples. A test consists of a minimum of three test runs. The results of the tests must be expressed in terms of sulfur dioxide concentration in parts per million and mass of sulfur dioxide emitted in pounds per hour.

E. During each one-hour period of a test run, two samples shall be taken with each sample taken during a 30-minute interval. The sampling time and sample volume for each sample shall be at least 20 minutes and 0.71 dry standard cubic feet, respectively.

5. The Director may order the Company to conduct or have conducted tests to determine compliance with the emissions limitations established herein at any time that he or she has reason to believe that an emissions limitation may be exceeded.

6. Should the Director exercise his or her option to conduct emissions tests or monitoring, the Company shall provide all necessary sampling connections and sampling ports to be located in such a manner as the Director may require, power for test equipment, safe sampling platforms and safe access to such sampling platforms.

EPA3GEN034858

VI. RECORDKEEPING, NOTICES AND REPORTING

The Company agrees to maintain records and submit reports to the Director as follows:

1. Final reports of the results and test data from all emission factor development tests and sulfur dioxide emission tests required prior to January 31, 1995 shall be submitted to the Director on or before March 1, 1995. Scrubber operating parameters recorded during the tests and a detailed description of the systems and devices installed to monitor and record scrubber and process operating parameters shall be submitted with these reports. The Company shall also, in its submission, describe data acquisition and recording procedures and the format(s) in which scrubber operating parameters are recorded.

2. On a calendar monthly basis, the Company shall submit reports showing the calculation of daily emissions of sulfur dioxide determined in accordance with Section V of this Consent Order. These reports shall be certified by a responsible official of the Company and shall be submitted by the 30th day following the end of each calendar month for which the report is prepared.

3. Except as otherwise provided in this Consent Order, any compliance test data required by the OAQ shall be submitted within thirty (30) days of the concluding day of the tests.

4. The Company shall maintain records of the occurrence and duration of any start-up, shut down or malfunction in the operation of sulfur dioxide emission sources, any malfunction of air pollution control equipment, or any periods during which a continuous monitoring system or device is inoperative.

5. The Company shall report to the Director, by telephone or telefax, any malfunction of a sulfur dioxide emissions source or its air pollution control equipment which results in any excess SO2 emission rate or concentration within twenty-four (24) hours of becoming aware of such condition. The Company shall also file a certified written report concerning the malfunction with the Director within ten (10) days providing the following information:

A. A detailed explanation of the factors involved or causes of the malfunction.

B. The date and time of duration (with starting and ending times) of the period of excess emissions.

C. An estimate of the mass of excess emissions discharged during the malfunction period.

D. The maximum emission rate or concentration measured or otherwise determined during the malfunction in units of the applicable emissions standard.

E. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction.

EPA3GEN034859

F. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.

6. All occurrences in which combustion gases from High Pressure Boilers 1, 2, 3, or 4 are routed to and discharged from scrubber systems A and B shall be reported in the manner required under Section VI.5.

7. After December 1, 1995 the Company shall submit for High Pressure Boilers No. 1, 2, 3, and 4 (scrubber stacks C and D) an excess emissions and monitoring systems performance report to the Director on a calendar monthly basis. All such reports shall be submitted to the Director by the 30th day following the end of each calendar month for which such report is prepared. Written reports of excess emissions shall include the following information:

A. The magnitude of excess emissions computed in accordance with 40 CFR §60.13(h), any conversion factor(s) used, the date and the time at which the excess emissions started and ended for each occurrence of excess emissions, and the process operating time during the reporting period.

B. Specific identification of each period of excess emissions that occurs during start-ups, shut downs, and malfunctions of the affected facility. Each malfunction report filed with the Director shall be referenced by report number with the date of occurrence and date of report submission noted.

C. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs and adjustments.

D. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

8. The Company shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this Consent Order.

9. All data and information required to be recorded or obtained under the terms of this Consent Order shall be maintained in a permanent form suitable for inspection and shall be retained for at least five (5) years following the date of the record or report. All such data and information shall be submitted in accordance with the terms of this Consent Order or made available to the Director upon his or her request or during any facility inspection by an authorized representative of the Director.

EPA3GEN034860

10. All reports required to be submitted to the Director under the terms of this Consent Order shall be certified by a responsible official of the Company. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

VII. OTHER PROVISIONS

1. In entering this Consent Order agreement, the Company and the OAQ seek to resolve the nonattainment issues in the New Manchester-Grant Magisterial District described in Section I, Findings of Fact, but the Company makes no admissions of fact or law with regard to those findings.

2. The Company agrees to comply with all requirements of this Consent Order and further agrees to waive any and all rights of appeal of this Consent Order.

3. Nothing contained in this Consent Order shall be interpreted in such a manner as to relieve the Company of the responsibility to make all necessary short-term emission reductions as provided and required in 45 CSR 11 - "Prevention of Air Pollution Emergency Episodes".

4. The provisions of this Consent Order are severable and should any provisions be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

5. Nothing contained in this Consent Order shall be construed to limit, in any way, the Director's authority to require the Company to install, calibrate, and operate continuous emission monitoring equipment for sources other than the High Pressure Boilers.

6. This Consent Order is binding on the Company, its successors, and assigns.

7. Violations of this Consent Order may subject the Company to penalties and injunctive relief in accordance with the Code of West Virginia.

8. The Director agrees that the Company shall have the right to petition the OAQ for an amendment to this Consent Order in the event of a "force majeure" condition. The petition shall allege such conditions with specificity. The Director, in his or her full and complete discretion, shall determine whether or not he or she will hear the Company's petition and the relief accorded, if any.

9. The Company shall not build, erect, install, or use any article, machine, equipment or process, the use of which 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.

EPA3GEN034861

10. This Consent Order shall become effective upon signing by both parties.

11. For the purpose of the administration of this Consent Order, all decisions and determinations required to be made by the Director of the Division of Environmental Protection may be made by the Chief of the OAQ and all reports and notifications required under this Consent Order shall be submitted to the Chief of the OAQ.

AND NOW, this 9th day of January, 1995, the OFFICE OF AIR QUALITY of the DIVISION OF ENVIRONMENTAL PROTECTION agrees to and enters into this Consent Order.

DIVISION OF ENVIRONMENTAL PROTECTION
OFFICE OF AIR QUALITY

By the Director of the Division of
Environmental Protection

WEIRTON STEEL CORPORATION hereby agrees with the provisions and consents to the terms of this Consent Order and agrees to comply with all requirements set forth herein.

AND NOW, this 9th day of January, 1995, WEIRTON STEEL CORPORATION, by its duly authorized representative, consents to, agrees to, and enters into this Consent Order.

WEIRTON STEEL CORPORATION

By Its Director, Environmental Control

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