West Virginia Department of
Commerce, Labor & Environmental Resources
Air Pollution Control Commission

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WEST VIRGINIA AIR POLLUTION CONTROL COMMISSION
1558 Washington Street, East
Charleston, West Virginia 25311

v.

CO-SIP-91-29

WHEELING-PITTSBURGH STEEL CORPORATION
c/o Mr. Bruce E. Morgan
1134 Market Street
Wheeling, WV 26003

CONSENT ORDER

Under the authority and direction of the West Virginia Code, Chapter 16, Article 20, Section 5 (17), which reads in pertinent part as follows:

> (17) Whenever the Commission achieves informally, by letter, or otherwise, an agreement with any person that said person will cease and desist in any act resulting in the discharge of pollutants or do any act to reduce or eliminate such discharge, such agreement shall be embodied in a Consent Order and entered as, and shall have the same effect as, an Order entered after a hearing as provided in Section 6 (§ 16-20-6) of this article,

this Consent Order is hereby entered.

I. FINDINGS OF FACT

1. Wheeling-Pittsburgh Steel Corporation (hereinafter referred to as the "Company") owns and operates a steel manufacturing facility located in Follansbee, West Virginia.

2. At the subject facility, there are numerous emission sources of total particulate matter which includes PM_{10} (particulate matter with aerodynamic particle size $\leq$ 10 microns) which are variable with regard to type and amount of such emissions.

3. This facility is subject to the Commission's Regulation 2 (45 CSR 2) - "To Prevent and Control Particulate Air Pollution From Combustion of Fuel in Indirect Heat Exchangers" and Regulation 7 (45 CSR 7) - "To Prevent and Control Particulate Air Pollution From Manufacturing Process Operations".

4. Portions of Follansbee, Brooke County, West Virginia and the Mingo Junction/Steubenville area of Jefferson County, Ohio were identified by USEPA as a Group I area with respect to the National Ambient Air Quality Standards (NAAQS) for PM_{10} in 52 FR 29383 on August 7, 1987. Pursuant to Section 101(a)(4)(B) of the Clean Air Act Amendments of 1990, the aforementioned area was designated as non-attainment with respect to the PM_{10} NAAQS by operation of law on November 15, 1990.

5. The Ohio Environmental Protection Agency and West Virginia Air Pollution Control Commission have undertaken studies and analyses to identify particulate matter, including PM_{10} emission sources which may cause or contribute to violations of the PM_{10} NAAQS and the West Virginia Air Pollution Control Commission staff has identified sources requiring emission control beyond current regulatory requirements or requiring clarification to current regulatory requirements as herein provided.

6. Title I of the 1990 Clean Air Act Amendment mandates that a plan to attain the PM_{10} NAAQS in Follansbee be submitted by West Virginia to USEPA by November 15, 1991 and that the area must achieve attainment by December 31, 1994.

7. This Consent Order shall be submitted to the USEPA for incorporation into the West Virginia State Implementation Plan under the federal Clean Air Act.

II. CONCLUSIONS OF LAW

1. The Commission is the Agency empowered and authorized to regulate and control pollution of the air in the State of West Virginia as set forth in the Code.

2. The Commission has acted in accordance with the Code.

3. The Commission has given proper notice in accordance with the Commission's rules.

III. COMPLIANCE PROGRAM

In addition to maintaining compliance with all existing applicable regulations and permits, the Company also agrees to implement and/or comply with source specific control measures, emission standards, recordkeeping and reporting requirements, and approved testing procedures established and/or referenced herein as follows:

1. Coal Crushing/Crusher

   A. Total particulate matter and PM_{10} emissions from Coal Crushing/Crusher shall not exceed 1.0 lb/hr and 0.51 lb/hr, respectively.

B. The coal crusher is housed within a fully enclosed structure that shall be maintained to achieve and assure a minimum 90% control efficiency of potential (uncontrolled) emissions of total particulate matter and PM_{10}.

C. There shall be no visible emissions from any point of the building housing the Coal Crushing/Crusher operations.

D. Compliance with Sections III.1.A., B., and C. shall be demonstrated on and after the date of entry of this Consent Order.

E. Compliance with Sections III.1.A., B. and C. shall be determined in accordance with the provisions of Section IV and Appendix A(A1) of this Consent Order. Only visible emission standards shall be applicable for emission control by passive (non-evacuated) full enclosure.

2. Coke Sizing and Screening/Stations No. 1 and No. 2

A. Total particulate matter and PM_{10} emissions from Coke Sizing and Screening operations at Stations No. 1 and No. 2 shall not exceed 1.48 lb/hr and 0.76 lb/hr, respectively from each station.

B. Coke Sizing and Screening operations at Stations No. 1 and No. 2 shall be performed within the existing fully enclosed structures that shall be maintained so as to achieve and assure a minimum 90% control efficiency of potential (uncontrolled) emissions of total particulate matter and PM_{10}.

C. There shall be no visible emissions exceeding 5% opacity from any point of the structures housing the Coke Sizing and Screening operations at Stations No. 1 and No. 2.

D. Compliance with Sections III.2.A., B., and C. shall be achieved on and after the date of entry of this Consent Order.

E. Compliance with Sections III.2.A., B. and C. shall be determined in accordance with provisions of Section IV and Appendix A(A1) of this Consent Order. Only visible emission standards shall be applicable for emission control by passive (non-evacuated) full enclosure.

3. Nos. 1, 2 and 3 Coke Oven Batteries - Pushing Operation

On and after the date of entry of this Consent Order, total particulate matter which includes PM_{10} emissions from all exhaust vent(s) on the baghouse controlling pushing emissions from Coke Oven Batteries 1, 2 and 3 shall not exceed 2.14 lb/hr.

4. Nos. 1, 2, 3 and 8 Coke Oven Batteries - Underfiring

A. Total particulate matter and PM_{10} emissions from coke oven battery combustion stacks shall not exceed the following limitations:

Stack ID	Total Particulate (lb/hr)	PM_{10} (lb/hr)
No. 1 Battery Stack	1.40	1.35
No. 2 Battery Stack	1.40	1.35
No. 3 Battery Stack	1.58	1.52
No. 8 Battery Stack	6.93	6.65

B. Compliance with the emission limitations of Section III.4.A. shall be achieved on and after the date of entry of this Consent Order.

5. Unpaved Roads, Parking Lots, Laydown, Entrance, Unloading Areas and Berms, and Irregular Paved Surfaces - Chemical Suppression.

A. The Company shall implement, maintain, and comply with dust control measures on all unpaved roads identified in this Section in a manner that achieves and assures 95% control efficiency as determined by methodology set forth in the USEPA reference document Control of Open Fugitive Dust Sources (EPA/450/3-88-008), Section 3.0, Unpaved Roads and in accordance with the following:

1. All unpaved roads in Appendix B Table 1 and Attachment 1 (map), of this Consent Order shall be treated at least every three weeks (tri-weekly) following the initial establishment of chemical ground inventory with a chemical dust suppressant (petroleum resin emulsion, asphalt emulsions or acrylic cements) on a year-round (12 month) basis, except as provided under Section III.5.A.5. and III.7.C. below. The dust suppressant application intensity and frequency during the first 2 months of this control program shall be sufficient to achieve the ground inventory specified in Section III.5.A.4. by the end of the 2 month period.

2. Tri-weekly applications shall be accomplished within twenty-three (23) days of prior applications except as provided under Section III.5.A.5. below.

3. For each dust suppressant application during the initial 2 month period of the dust control program, the concentrated dust suppressant shall be diluted at a ratio of not more than five (5) parts water to one (1) part concentrate and the resulting solution shall be applied at a minimum rate of 1.0 gallon per square yard of unpaved surface area. The dust suppressant shall be applied at sufficient intervals and intensities after the initial 2 month period so as to maintain the ground inventory and achieve a 95% dust control effectiveness. The continuing program shall

provide for at least tri-weekly applications of dust suppressant diluted by no more than seven (7) parts water to one part chemical and applied at a rate of not less than 0.5 gallons per square yard of unpaved surface.

4. A minimum ground inventory of 0.25 gallons of concentrate per square yard of road surface, as specified in Section 3.0 of the USEPA reference document Control of Open Fugitive Dust Sources (EPA/450/3-88-008) shall be maintained.

5. Tri-weekly applications of dust suppressant may be delayed by not more than three (3) days from any scheduled date upon which the unpaved road surface is frozen, snow covered, or has experienced $\geq$ 0.25 inches of rainfall.

   In the event of persistent adverse weather conditions such as freezing, snow cover, or excessive rainfall, the Company may petition the Director verbally with written confirmation within three (3) days for extended exemptions which may be granted as deemed appropriate by the Director.

B. The Company shall implement, maintain, and comply with dust control measures on all unpaved parking lots, laydown, entrance, loading, unloading areas, berms, and irregular paved surfaces that can not be adequately cleaned under the provisions of Section III.6. of this Consent Order, in accordance with the following:

1. After the initial treatment to establish the required ground inventory of chemical dust suppressant within the first 2 months of the unpaved surface dust control program, all unpaved areas and irregular paved surfaces identified in Table 1 and Attachment 1 (map) of Appendix B of this Consent Order shall be treated with chemical dust suppressant (petroleum resin emulsion, asphalt emulsion or acrylic cements) at least at the frequencies set forth in Appendix B, Table 1 on a year round (12 month) basis.

2. Monthly and quarterly applications shall be made before the end of the first full week of the month/quarter except that the Company may seek extensions of time due to persistent adverse weather conditions in accordance with Section III.5.A.5.

3. For each monthly/quarterly application after the initial 2 month treatment period, the concentrated dust suppressant shall be diluted at a ratio of not more than seven (7) parts water to one (1) part concentrate and the resulting solution shall be applied at a minimum coverage rate of 0.5 gallons per square yard of surface area.

C. Compliance with Sections III.5.A. and B. shall be determined in accordance with procedures set forth in Appendix A2 of this Consent Order.

D. Control Equipment

The Company shall assure the availability, required scheduling, and proper maintenance of spray trucks that are designed and equipped, at minimum with a 2,000 gallon capacity tank, a spray bar system capable of applying the dust suppressant solution at a coverage rate of at least 1.3 gallons per square yard of surface, a certified flow metering device calibrated in units of gallons per minute, and apparatus that will facilitate manual application of the solution to areas not readily accessible by the spray truck.

E. Recordkeeping and Reporting

1. The Company shall maintain records relative to the program to control emissions from unpaved roads, parking lots, laydown, entrance, unloading areas and berms identified in Appendix B, Table 1. These records shall include, at a minimum, the following information:

   a. Control equipment maintenance records.

   b. Scheduled and unscheduled equipment malfunctions and downtime.

   c. Meteorological log to include average daily temperature, daily precipitation and unusual meteorological occurrences.

   d. The date, type and quantity received for each delivery of chemical dust suppressants.

   e. For each dust suppressant application date, start and stop times, average truck speed, number of passes and amount of solution applied for each unpaved road, area or berm identified in Appendix B, Table 1.

   f. Identification of areas where manual spraying was utilized.

2. These records shall be retained by the Company for three (3) years and shall be made available to the Director or his representative upon request.

3. A calendar quarterly report shall be submitted to the Director. The report shall contain all of the information cited above and a description of any deviations from the control program and the reasons for such deviations. The report shall be certified to be accurate by management and shall be submitted within fifteen (15) days after the end of the quarter.

4. The Company shall notify the Director, in writing, of any non-compliance with Section III.5. of this Consent Order. Such notice shall be submitted within five (5) days of the non-compliance occurrence and shall include a detailed explanation of the cause of such non-compliance, all remedial actions required, and the date by which compliance was or will be re-established.

F. The Company shall implement the dust control measures of Section III.5. as soon as practicable and shall demonstrate compliance with all provisions therein no later than July 1, 1992.

6. Paved Roads - Flushing and Vacuum Sweeping

A. The Company shall implement, maintain, and comply with dust control measures on all paved roads identified in this Section in a manner that achieves and assures 95% control efficiency as determined by methodology set forth in the USEPA reference document Control of Open Fugitive Dust Sources (EPA/450/3-88-008), Section 2.0, Paved Roads, and in accordance with the following:

1. All paved roads identified in Table 1 and Attachment 1 (map) of Appendix B of this Consent Order shall be cleaned via concurrent water flushing and vacuum sweeping on a daily, year-round (12 month) basis except as provided under Section III.6.a. and b. below.

a. Daily flushing and sweeping may be suspended only under the following adverse weather conditions:

Weather Condition	Permitted Exemption
$\geq$ 0.25 inches rainfall	Flushing
Freezing surface	Flushing
Snow cover	Flushing and sweeping

All such suspensions shall be reported and verified as required under Section III.6.D. (Recordkeeping and Reporting).

b. Irregular paved surfaces that cannot feasibly or adequately be cleaned by vacuum sweeping shall be chemically sprayed in accordance with provisions of Section III.5.

B. Compliance with Section III.6.A. shall be determined in accordance with procedures set forth in Appendix A3 of this Consent Order.

C. Control Equipment

1. The Company shall assure the availability, required scheduling, and proper maintenance of vacuum sweeping trucks. These

trucks shall be equipped with an adequate water tank and a spray bar mounted ahead of the brooms unless separate vehicles are utilized for flushing. The collection hopper of the vacuum truck shall be designed and maintained so as to prevent fugitive dust emissions.

2. Material collected by the vacuum sweeping truck shall be handled and disposed of in a manner that minimizes fugitive dust emissions, including but not limited to, wet dumping and chemical treatment or stabilization of stored material.

D. Recordkeeping and Reporting.

1. The Company shall maintain daily records for the paved road cleaning program. These records shall include, at a minimum, the following information:

   a. Control equipment maintenance records.

   b. Scheduled and unscheduled equipment malfunctions and downtime.

   c. Meteorological log to include average daily temperature, daily precipitation and unusual meteorological occurrences.

   d. Qualitative description of the road surface conditions.

   e. Start and stop times, average truck speed, number of passes and estimation of amount of water used for each paved road identified in Appendix B, Table 2.

   f. Identification of areas where chemical treatment was utilized.

   g. Qualitative descriptions of areas of unusually high silt loadings from spills and track-ons.

   h. Total amount of dust collected by vacuum trucks in pounds or tons.

2. These records shall be retained by the Company for three (3) years and shall be made available to the Director or his representative upon request.

3. A calendar quarterly report shall be submitted to the Director. The report shall contain all of the information cited above and a description of any deviations from the control program and the reasons for such deviations. The report shall be certified to be

accurate by Company management and shall be submitted within fifteen (15) days after the end of the quarter.

4. The Company shall notify the Director, in writing, of any non-compliance with Section III.6. of this Consent Order. Such notice shall be submitted within five (5) days of the non-compliance occurrence and shall include a detailed explanation of the cause of such non-compliance, all remedial actions required and the date by which compliance was or will be re-established.

E. The Company shall implement the dust control measures of Section III.6. as soon as practicable and shall demonstrate compliance with all provisions therein not later than July 1, 1992.

7. Changes to Paved and Unpaved Road Dust Control Programs

A. The Company has the right to petition the Commission and the USEPA for written approval of definitive treatment methods, treatment schedules and procedures or reporting requirements different from those required herein. Such alternative practices must be demonstrated to the Commission and USEPA to result in equivalent dust control effectiveness in accordance with Control of Open Fugitive Dust Sources (EPA/450/3-88-008). Notwithstanding the provision of Paragraph VI.1. of this Consent Order, the Company reserves the right to contest any disapproval of such petition in the appropriate judicial forum.

B. In the event that the Company certifies that all of a roadway or parking area identified in Appendix B has been discontinued, the dust suppression or surface cleaning program for that road or parking lot may be terminated or reduced. If the Company begins to utilize any new roadway, parking lot or other vehicular activity area not shown in Appendix B, it must notify the Director in the reports required under this Consent Order and treat or clean the road or area in accordance with the procedures contained herein.

C. The Director shall not be precluded from requiring adjustments, including increased chemical suppressant application or cleaning, if on-site inspections reveal that the program contained herein does not prevent excessive visible dust entrainment and emissions from a particular road or surface.

D. In the event that an unpaved road or area that has been chemically treated becomes completely hardened and cemented by such treatment so as to become like a paved road as demonstrated by observation, by compaction tests and silt analyses or in the event that the Company paves any unpaved haul road or area, that road or area may be treated as a paved surface and cleaned in accordance with the procedures outlined in Section III.6.

IV. COMPLIANCE DETERMINATION PROCEDURES

1. Compliance with all total particulate matter mass emission standards under Regulation 2 (45 CSR 2), Regulation 7 (45 CSR 7), and this Consent Order shall be demonstrated in accordance with test procedures set forth in TP-2 - "Compliance Test Procedures for Regulation 2 - `To Prevent and Control Particulate Air Pollution From Combustion of Fuel in Indirect Heat Exchangers'", and 45 CSR 7A (TP-4) - "Compliance Test Procedures for Regulation 7 - `To Prevent and Control Particulate Air Pollution From Manufacturing Process Operations'", except as follows:

   a. Particulate mass emission tests for process emission sources subject to Regulation 7 (45 CSR 7) and this Consent Order shall be conducted only in accordance with 40 CFR 60, Appendix A, Methods 1 through 5 unless alternative procedures or procedural variances are approved by the Director and USEPA.

   b. All minor exceptions and variances to the test procedures set forth in TP-2 shall be approved by the Director and all alternative procedures and procedural variances shall be approved by the Director and USEPA.

2. Compliance with all PM_{10} mass emission standards under this Consent Order shall be demonstrated in accordance with test procedures set forth in 40 CFR 51, Appendix M, Methods 201, 201A and 202.

3. The Company shall submit a test protocol as required by TP-2 and 45 CSR 7A (TP-4) at least thirty (30) days prior to any test to determine compliance with the provisions of this Consent Order or Commission regulations and shall notify the Director of the dates of all such compliance tests at least fifteen (15) days prior to testing.

4. Compliance with the visible emissions standards of Regulation 2 (45 CSR 2) and any visible emission limitations established in this Consent Order shall be determined by observers certified in accordance with 40 CFR 60, Appendix A, Method 9 and following the observation procedures of Method 9. In determining compliance with the visible emission standards under Section 3 of Regulation 2 (45 CSR 2) and any visible emission limitations established in this Consent Order, each visible emission observation shall represent a fifteen (15) second period and visible emission observations shall not be averaged.

V. CONTINGENCY MEASURES

1. Upon issuance of a formal determination by USEPA after December 31, 1994 that attainment with the National Ambient Air Quality Standard for PM_{10} has not been achieved, the Company shall implement a PM_{10} emission reduction plan (contingency plan) established in accordance with Section V.2. to achieve an additional actual PM_{10} emissions reduction of 6.5 lb/hr and 28.5 TPY.

2. The Company shall submit a definitive contingency plan for reduction of PM_{10} emissions by the amount specified in Section V.1. on or before July 1, 1992 and such plan shall be embodied in a Consent Order to be approved by the Commission on or before December 31, 1992.

3. The emissions control program required under Section V.1. and 2. shall be achieved in accordance with the following schedule:

Action	Schedule (To be Determined)
Initiate engineering design and prepare specifications:	To be determined when plan is approved.
Issue purchase orders for equipment and finalize controls for installation:	To be determined when plan is approved.
Begin construction (or commence control program):	To be determined when plan is approved.
Complete construction and demonstrate compliance:	Within 360 days of receipt of EPA notice of nonattainment determination.

VI. OTHER PROVISIONS

1. 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.

2. Within fifteen (15) days following any incremental Compliance Program date under Sections III and V of this Consent Order, the Company shall certify in a written status report to the Director that the increment of progress to be completed by that particular Compliance Program date has been achieved. In the event that the Company fails to achieve any Compliance Program date, the required status reports shall document in full the causes of such failure, shall provide the date that the particular Compliance Program date will be met and shall contain a full explanation of the effect of the missed Compliance Program date upon the Company's ability to comply with all subsequent Compliance Program measures and dates contained under Sections III and V. As further provided herein, failure to comply with any Compliance Program date established under Section III constitutes a violation of this Consent Order and may subject the Company to penalties or other enforcement actions by the Commission.

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

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

7. The Company agrees that in the event that the Commission promulgates regulations while this Consent Order is in effect which require control of emissions from the subject facility beyond the limitations herein or regulations currently applicable, such additional regulations shall be applicable to the subject facility notwithstanding the provisions of this Consent Order.

8. Violations of this Consent Order may subject the Company to penalties in accordance with Chapter 16, Article 20, Section 8 and/or injunctive relief in accordance with Chapter 16, Article 20, Section 9 of the Code of West Virginia. This Consent Order shall serve as written notice of violation as contemplated in Code 16-20-8(a) for failure to achieve or implement each scheduled provision of Sections III and V of this Consent Order.

AND NOW, this 14th day of November 1991, the WEST VIRGINIA AIR POLLUTION CONTROL COMMISSION agrees to and enters into this Consent Order.

WEST VIRGINIA AIR POLLUTION
CONTROL COMMISSION

L. Newton Thomas Jr.
By Its Chairman

WHEELING-PITTSBURGH 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 14th day of November 1991, WHEELING-PITTSBURGH STEEL CORPORATION, by its duly authorized representative, consents to, agrees to and enters into this Consent Order.

WHEELING-PITTSBURGH STEEL CORPORATION

By John R. Sampson

Its Director, Env. Control

JT/taa

09/16/91

APPENDIX A

A1 Compliance Determination for Full Enclosures as a Control Device

Compliance with the provisions of this Consent Order, specifically Section III.1, Coal Crushing/Crusher and Section III.2, Coke Sizing and Screening Stations No. 1 and No. 2 shall be based on in-plant inspections by Agency personnel in a manner specified herein. Said inspections shall be conducted at a minimum, once per year and shall consist of the following:

1. The inspector will physically inspect the above cited process operations and related enclosures and record opacity observations, which shall not be averaged, for an appropriate period of time. In conjunction with the observations, the inspector will provide the information requested in form A-1(1) (attached) for each of the three process operations and enclosures.

2. The inspector will compile a narrative report attaching Form A-1(1) and his opacity observations with any recommendations and submit such to the Director.

ENCLOSURE INSPECTION FORM

Form A-1(1)

ame of company :
ailing address :
lant address :
Phone number :
Plant contact :
Inspector/Title :
Date : ____/____/____

Process name :
Location :
Description :

ENCLOSURE INSPECTION/OBSERVATIONS	
1. Is process still in operation?	
2. Are there changes in process?	
3. Does enclosure still exist?	
4. Are there any cracks, splits or openings at the enclosure?	
. Are there any observable emissions from the enclosure? Describe.	
6. Have repairs been performed on the enclosure? Describe.	
7. Have there been any changes or alterations to the enclosure?	
8. Is the enclosure adjudged to be compliant with the consent order?	

9. Additional comments/observations:

Signed :
Title :
Date :

2 Compliance Determination for Unpaved Roads and Areas

Information contained herein is taken from the document Inspection Manual for PM_{10} Emissions from Paved/Unpaved Roads and Storage Piles authored by Midwest Research Institute for the USEPA (Contract No. 68-02-4463) October 27, 1989.

Compliance with the provisions of the Consent Order, specifically Section III.5. Unpaved plant roads, parking lots, laydown, entrance, unloading areas and berms - chemical suppression shall be determined by assessment and evaluation of the Company's quarterly reports as required by Section III.5.E. of the Consent Order. In addition, compliance shall also be determined by a qualitative and/or quantitative assessment of the specified control program by agency personnel as provided herein.

1. Assessment of the Unpaved Road Dust Control Program

Assessment of the unpaved road dust control program shall be based on in-plant inspections by agency personnel. Said inspections shall be conducted, at a minimum, once per year and shall consist of the following:

A. The inspector will complete Form A-2(1) prior to the physical inspection based upon observation or accurate information that the Company shall provide.

B. The inspector will physically view the unpaved road segments and areas defined in Appendix B and Appendix C of the Consent Order. In conjunction with the observations, the inspector will provide the information requested in Form A-2(2). Segments shall be adjudged as to their surface condition and qualitative assessment of emissions from vehicular activity and other pertinent information as observed by the inspector such as carryover of material from a construction activity shall b noted.

C. If possible, the inspector will observe the application of the dust suppressant at any segment. The adequacy of the spray pattern and coverage shall be adjudged and noted in the comment section of Form A-2(1) relative to the observed segment.

D. The inspector will review any operator logs or other records pertinent to the control program such as those required in Section III.5.E. of the Consent Order. Copies will be made available upon the inspectors request.

E. The inspector may request and the Company shall provide information on surface silt content, mean vehicle speed, mean vehicle weight and/or mean number of wheels per vehicle. Should the inspector collect, or require the Company to collect, surface material samples for silt analysis, such sampling and analysis shall be in conformance to the methods specified in Inspection Manual for PM10 Emissions from Paved/Unpaved Roads and Storage Piles, MRI, EPA Contract Number 68-02-4463 Appendix F.

F. As part of the assessment of the unpaved road dust control program, an engineering evaluation will be conducted, utilizing pertinent Company records, to arrive at an average percent of PM_{10} control efficiency as follows:

1. The inspector will obtain relative information from Company records, required in Form A-2(3) (attached). At a minimum, the inspector will obtain an

application intensity per treatment (in gal/yd^2), the dilution ratio per treatment, and number of days since last treatment.

2. Using the information from form A-2(3), the inspector will calculate the ground inventory which is a measure of residual effects from previous applications. Ground inventory is found by adding together the total volume (per unit area) of concentrate (not solution) since the start of the program or dust control season. No credit for control is assigned until the ground inventory exceeds 0.05 gal/yd^2. Ground inventory shall be found by multiplying the application intensity (gal/yd^2) times the dilution ratio. The product is then added to the ground inventory calculated for the previous application. This number is plotted on the curve in Figure A-2 to arrive at an average PM_{10} control efficiency for the time period shown. (Reference: Inspection Manual for PM_{10} Emissions From Paved/Unpaved Roads and Storage Piles, MRI, EPA Contract No. 68-02-4463, Section 4.3.3.)

G. The inspector shall compile a narrative report including all forms and pertinent records along with any recommendation and submit such to the Director.

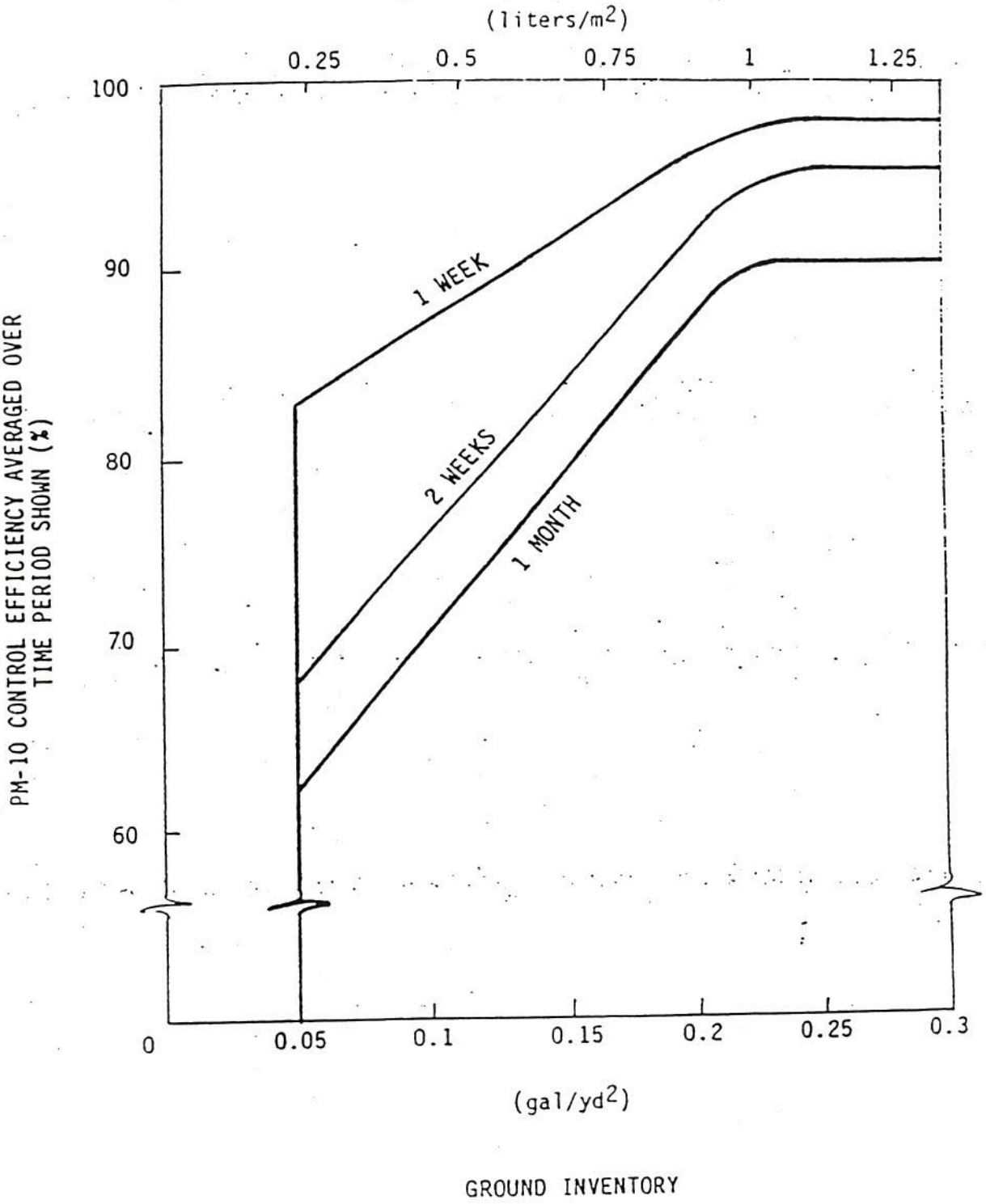


Figure A-2 Average PM_{10} control efficiency for chemical suppressants.

UNPAVED ROAD/AREA INSPECTION FORM

Form A-2(1)

Name of company :
Mailing address :
Plant address :
Phone number :
Plant contact :
Inspector/Title :
Date : _____/_____/_____

GENERAL QUESTIONS FOR PLANT PERSONNEL	Y	N	N/A	COMMENTS
1. Have any roads been eliminated/ blocked off since last inspection?				
2. Have any roads been paved since last inspection?				
3. Have traffic volumes/ vehicle characteristics on roads changed?				
4. Any process changes that would affect road program?				
5. Any changes been made in road control program?				
6. Any new equipment?				
7. Any equipment downtime since last inspection?				
8. Any chemicals received since last inspection?				
9. Any repair of roads? (bladed, patching, etc.)				
10. Are records in order?				

ADDITIONAL COMMENTS:

INSPECTOR'S SIGNATURE: _____

DATE: _____/_____/_____

Form A-2(2)

WHEELING - PITTSBURGH STEEL DUST SUPPRESSION INSPECTION FORM

SEGMENT	SURFACE CONDITION (1)	TRAFFIC EMISSIONS (2)	COMMENTS
D			
E			
F			
L			
M			
N			
O			
S			
V			
IMS-A			
AREAS			
H			
J			
P			
Q			
R			
PARKING LOTS			
G			
K			
T			
V			
W			
BERMS			
I			

(1). O - observed , N/O - not observed , G - good , F - fair , P - poor
(2). O - observed , N/O - not observed , L - light , M - med , H - heavy

General weather conditions: _____

Inspector / Title / Date: _____

CHEMICAL SUPPRESSANT APPLICATION LOG AND WORKSHEET

Site Description _____

Treatment No.	Date	Application Intensity (gal/yd^2)	Dilution Ratio (water:chem)	Ground Inventory (gal/yd^2)	Period (days)	Average PM_{10} Control (%)

Form A-2(3) Example chemical suppressant application log.

APPENDIX A

\3 Compliance Determination for Paved Roads and Areas

Information contained herein is taken from the document Inspection Manual for PM_{10} Emissions from Paved/Unpaved Roads and Storage Piles authored by Midwest Research Institute for the USEPA (contract No. 68-02-4463) October 27, 1989.

Compliance with the provisions of the Consent Order specifically Section III.6 Paved Roads - Flushing and Vacuum Sweeping shall be determined by assessment/evaluation of the company's quarterly reports as required by Section III.6.D. of the Consent Order. In addition, compliance shall also be determined by a qualitative and/or quantitative assessment of the specified control program by agency personnel as provided herein.

1. Assessment of the Paved Road Dust Control Program

Assessment of the paved road dust control program shall be based on in-plant inspections by agency personnel. Said inspections shall be conducted, at a minimum, once per year and shall consist of the following:

A. The inspector will complete Form A-3(1) prior to the physical inspection based upon observation or accurate information that the Company shall provide.

B. The inspector will physically view the paved road segments defined in Appendix B and Attachment 1 of the Consent Order. In conjunction with the observations, the inspector will provide the information requested in Form A-3(2). Paved, road segments shall be adjudged as to their surface condition. Qualitative assessment of emissions from vehicular activity and other pertinent information as observed by the inspector such as carryover or deposits of material from a construction activity or unpaved roads and areas.

C. If possible, the inspector will observe the operation of the flushing-vacuum sweeping control equipment on all or any road segments. The adequacy of the control equipment, and/or operation thereof, shall be evaluated and noted in the comment section of Form A-3(2) relative to the observed segment.

D. The inspector will review any operational logs or other records, such as those required in Section III.6.D. of the Consent Order. Copies shall be made available upon the inspectors request.

E. As part of the assessment of the paved road dust control program, a quantitative engineering evaluation may be conducted utilizing silt sampling and analysis procedures. The Company shall provide to the Director all requested necessary information for this assessment. The sampling may be conducted by the Company, West Virginia Air Pollution Control Commission or USEPA together or separate at least once per year or at any other times as deemed necessary by the Director of USEPA. Sampling and analysis shall be as follows:

1. Sampling and analysis shall be performed in a manner specified in Inspection Manual for PM10 Emissions from Paved/Unpaved Roads and Storage Piles, MRI, EPA Contract Number 68-02-4463 Appendix F.

2. Sampling shall be conducted before and after flushing, vacuum sweeping. Results shall be reported in grams/square meter. Control effectiveness shall be evaluated by comparing the "before" and "after" silt loadings. These loadings shall also be used in the paved road emission rate equation specified in AP-42, 11.2-G-3 to evaluate the control effectiveness.

F. The inspector shall compile a narrative report including all pertinent forms, records and applicable sampling results and submit such to the Director.

PAVED ROAD/AREA INSPECTION FORM

Name of company : _____
Mailing address : _____
Plant address : _____
Phone number : _____
Plant contact : _____
Inspector : _____
Date : _____/_____/_____

GENERAL QUESTIONS FOR PLANT PERSONNEL	Y	N	N/A	COMMENTS
1. Have any roads been eliminated/ blocked off since last inspection?				
2. Have roads been paved since last inspection?				
3. Have traffic volumes/vehicle characteristics on roads changed?				
4. Any process changes that would affect road program?				
5. Any changes been made in road control program?				
6. Any new equipment?				
7. Any equipment downtime since last inspection?				
8. Any repair of roads (patching, new asphalt)?				
9. Are records in order?				

ADDITIONAL COMMENTS:

INSPECTOR'S SIGNATURE: _____

DATE: _____/_____/_____

Form A-3(2)

WHEELING-PITTSBURGH STEEL DUST SUPPRESSION INSPECTION FORM: PAVED ROADS

Segment	Surface Condition (1)	Traffic Emissions (2)	COMMENTS
A			
B			
C			
I			

(1). O - observed, N/O - not observed, G - good, F - fair, P - poor
(2). O - observed, N/O - not observed, L - light, M - med, H - heavy

General weather conditions: _____

Inspector/Title/Date: _____

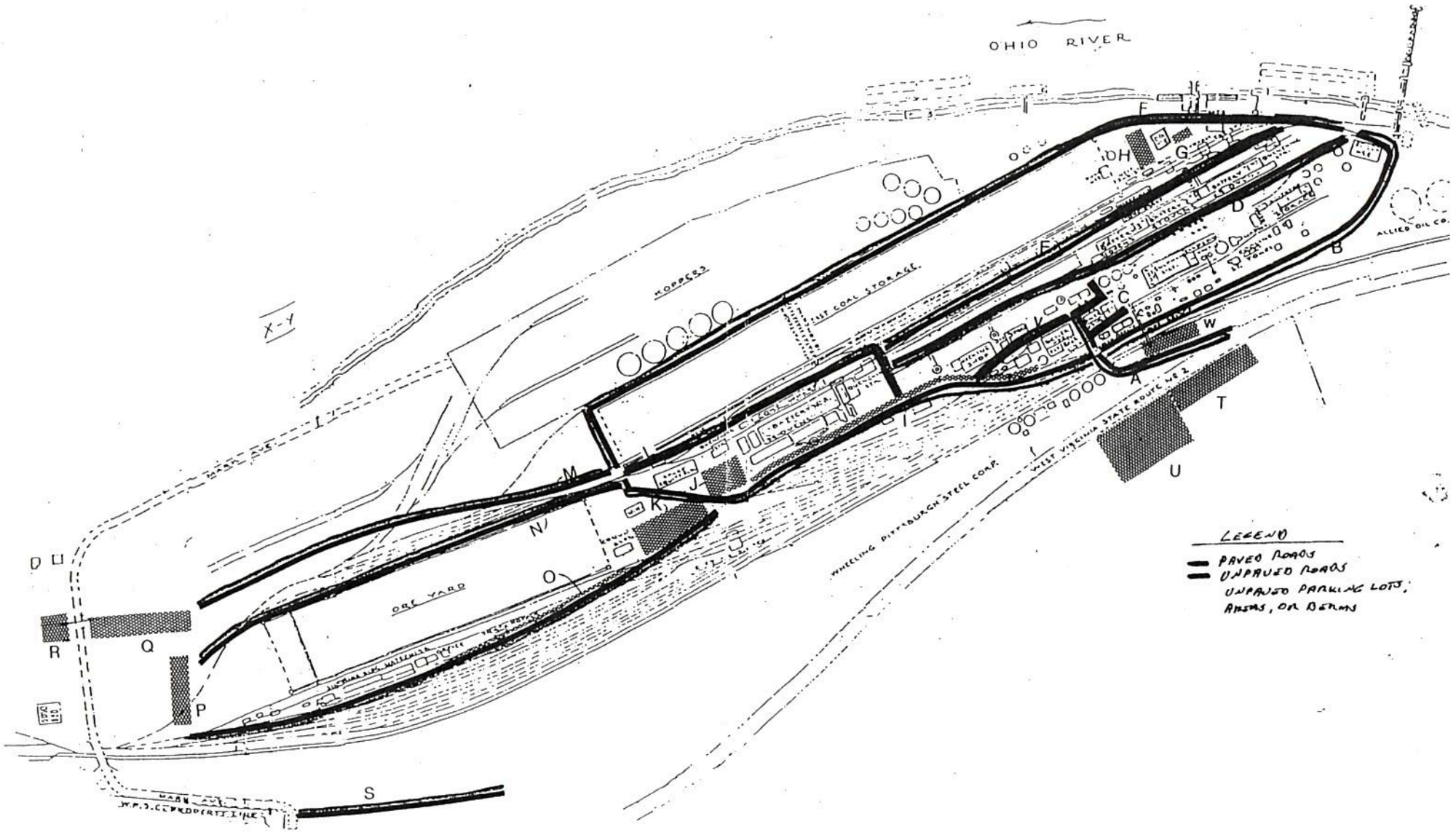
APPENDIX B

Table 1 - Unpaved Roads and Areas

Source Type	Road/Area Segments	Application Frequency
Unpaved Roads	D, E, F, L, M, N, O, S, V, IMS (Z, Y)	Every three (3) weeks
Unpaved parking lots	G, K, T, V, W	Once every month
Unpaved laydown entrance and unloading areas	H, J, P, Q, R	Once every quarter
Unpaved berms of paved roads	Berms at road I	Once every quarter
Unpaved berms of unpaved roads	Berms at road O	Once every quarter

Table 2 - Paved Roads

Source Type	Road Segments	Flushing and Vacuum Sweeping Frequency
Paved Roads	A, B, C, I	Once per day Seven days per week


OHIO RIVER
X-Y
HOPPERS
1ST COAL STORAGE
ORE YARD
WHEELING PITTSBURGH STEEL CORP.
WEST VIRGINIA STATE ROUTE NO 2
ALLIED OIL CO.
A
B
C
D
E
F
G
H
I
J
K
M
N
O
P
Q
R
S
T
U
W
LEGEND
PAVED ROADS
UNPAVED ROADS
UNPAVED PARKING LOTS, AREAS, OR BERMS