Attachment A
Supplemental Environmental Project
Statement of Work

At its Middletown, Ohio, facility, AK Steel Corporation, Middletown Works ("Respondent"), must complete a Supplemental Environmental project (SEP) to upgrade the pollution control equipment (PCE) that captures and controls particulate matter emissions from the Wilputte Battery pushing operation, as follows:

1. Optimally design and increase the size of the movable hood that is responsible for capturing particulate matter emissions from the Wilputte Battery pushing operation;

    a. No later than 30 days following the date of the CAFO, Respondent shall retain an independent third-party engineering firm with experience in ventilation studies and pollution control equipment capture and control efficiency ("third-party firm") to conduct a detailed engineering analysis of the PCE and identify an appropriate hood necessary to maximize capture and control of fugitive particulate matter emissions from the Wilputte Battery pushing operations;

    b. The engineering analysis of the PCE system shall include computational fluid dynamics modeling to identify the most appropriate design of a new PCE hood, determining design factors, such as (1) the hood shape and size, (2) the offtake diameter, length and flow path, (3) the potential use of internal hood baffles, and (4) the distance of the hood above the quench car;

    c. By December 31, 2016, Respondent shall complete construction and begin operation of the new PCE hood recommended through the engineering analysis;

    d. The total cost of the new PCE hood, which includes capital cost of the new PCE hood and installation of the new PCE hood, must be at least $450,000. The total cost excludes any costs incurred in the performance of the third-party engineering analysis;

    e. Respondent shall video record, at minimum, five pushes using the existing hood, and five pushes after the new PCE hood begins operation and submit the video records as part of the SEP Completion Report described below.

    f. Respondent shall submit a copy of the third-party engineering firm's report that shows the firm's conclusions, options for improvements, its recommendations, and the justification for those recommendations.

2. Respondent shall operate the upgraded PCE during pushing operations.

3. Within 60 days following completion of the SEP, Respondent shall submit a report to the United States Environmental Protection Agency, Region 5, containing the following information:

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a. Detailed description of the SEP as completed;

b. Description of any operating problems and the actions taken to correct the problems;

c. Itemized cost of goods and services used to complete the SEP, documented by copies of invoices, purchase orders or canceled checks that specifically identify and itemize the individual cost of the goods and services;

d. Certification that Respondent has completed the SEP in compliance with this CAFO; and

e. Description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

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