



**GROUP AGAINST SMOG &
POLLUTION**

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March 13, 2020

Mr. Mark Gorog, Environmental Program Manager
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

**Re: Comments of Group Against Smog and Pollution Regarding the
RACT II Determination and Draft Title V Operating Permit for
ArcelorMittal Monessen LLC/Monessen Plant (# 65-00853)**

Dear Mr. Gorog:

Please accept these comments regarding the Department's RACT II determination for the ArcelorMittal Monessen LLC/Monessen Plant (the "Facility"), which I am submitting on behalf of the Group Against Smog and Pollution. According to the notice published in the Pennsylvania Bulletin on February 15, 2020 (at 50 Pa. B. 979), the Department is accepting written comments on the determination through March 16, 2020.

Very truly yours,

/s

John K. Baillie
Senior Attorney

**COMMENTS OF THE GROUP AGAINST SMOG AND POLLUTION
REGARDING THE RACT II DETERMINATION FOR
ARCELORMITTAL MONESSEN LLC/MONESSEN PLANT (65-00853)**

Pennsylvania’s air pollution control regulations define “Reasonably Available Control Technology” (“RACT”) to mean “the lowest emission limit for VOCs or NOx that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.”¹ For an emission limit to qualify as RACT, it must be “consistently achievable.”² Accordingly, when records of operating results for a particular source show that the source is consistently able to achieve lower emissions of VOCs or NOx than its existing permit limits, such lower levels of emissions would presumably constitute RACT for the source.

Although the Department considered several control technologies and good operating practices in its RACT II determination for the Facility, it is not clear that the Department considered whether the operating results for the sources of VOCs and NOx within the Facility allow a determination that such sources can consistently achieve lower emissions of VOCs and NOx than are authorized by the Facility’s Title V Operating Permit.³ If not, the Department should review records of operating results for the Facility to determine whether any of the sources of VOCs or NOx within the Facility are consistently able to achieve lower emissions than those currently authorized by the Facility’s Title V Operating Permit, and, if so, reduce emission limits accordingly.

¹ 25 Pa. Code § 121.1.

² See Approval and Promulgation of Air Quality Implementation Plans; Pennsylvania; Regulatory Amendments Addressing Reasonably Available Control Technology Requirements Under the 1997 and 2008 8-Hour Ozone National Ambient Air Quality Standards, 84 Fed. Reg. 80274, 20277 (May 9, 2019).

³ See DEP Southwest Regional Office, Review of Application for Renewed Title V Operating Permit and RACT II Minor Modification, ArcelorMittal Monessen LLC/Monessen Plant, Attachments 2 and 3 (Feb. 3, 2020).