

ALLEGHENY COUNTY HEALTH DEPARTMENT

Air Quality Program

SUMMARY OF PUBLIC COMMENTS AND DEPARTMENT RESPONSES ON THE PROPOSED ISSUANCE OF UNITED STATES STEEL CORPORATION MON VALLEY WORKS EDGAR THOMSON PLANT TITLE V OPERATING PERMIT NO. 0051

[Notice of the opportunity for public comment appeared in the legal section of the Pittsburgh Post-Gazette on September 23, 2013. The public comment period ended on October 24, 2013.]

General Comments

1. **COMMENT:** Contrary to Title V of the Clean Air Act and its authority under Article XXI of the Allegheny County Health Department (ACHD) regulations, ACHD has established new emission limits in the Title V Permit. Any new emission limits and all new substantive requirements should be removed from the Title V permit. (1 Commenter)

RESPONSE: The Department disagrees and provides the following explanations.

40 CFR Part §70.1(b) actually says "... While title V does not impose substantive new requirements, Part 70 §70.1(a) also states "...These regulations define the minimum elements required by the Act for State operating permit programs ..." and §70.1(c) states "Nothing in this part shall prevent a State, or interstate permitting authority, from establishing additional or more stringent requirements not inconsistent with this Act. The EPA will approve State program submittals to the extent that they are not inconsistent with the Act and these regulations..." There is no definition or explanation of substantive new requirements. The EPA has approved the Department's Operating Permit programs for major and minor sources.

The Article XXI regulations governing Major Sources (Title V) are found in Part C Subparts 1 and 2. Minor Sources and Synthetic Minor Sources are subject to Part C Subpart 1. The Department considers the permit to be both a Title V (Major Source) Operating Permit (TVOP) and a Federally Enforceable State Operating Permit (FESOP). Therefore, the Operating Permit should, at a minimum, include requirements that are in Minor Source operating permits (FESOPs).

The Department has been issuing operating permits with short- and long-term emission limits for at least 20 years (for example 92-I-0015P). This was begun in order to have federally enforceable emission limitations for attainment demonstrations. Currently, all minor source and major source operating permits contain emission limits. There is nothing inconsistent with the Clean Air Act in limiting maximum potential emissions on a lb/hr or ton/year basis. Title V Operating Permits must meet all of the requirements of §2103.10 through §2103.15 in addition to the Title V specific requirements of §2103.20 - §2103.25. These minor source requirements are also Federally Enforceable.

Hourly and annual emission limits may be needed as enforceable limits in State Implementation Plan (SIP) submittals. They are needed in modeling for significant impact levels. These limits are needed to determine regulatory applicability (e.g., NSR/PSD, stack testing (§2108.02)). The permit limits are established at maximum potential to emit based on the maximum capacity of the source as provided by the permittee in the certified permit application. These limits indicate worst case emissions due to normal operation of the source and do not restrict the permittee's operations.

Article XXI requires that the conditions of the Operating Permit “provide for and require compliance with all applicable requirements, including but not limited to all applicable requirements of this Article.” The emission limits for SO₂ and PM are derived from the Article XXI regulations governing those pollutants (lb/MMBtu). These are not new substantive requirements and are merely a translation into mass emission rates based on maximum capacities provided by U.S. Steel.

Additionally, Article XXI, §2103.12.a.2.B states that RACT shall be applied to sources for pollutants regulated by Article XXI where there is no specific emission limitation given by the Article. NO_x, CO, VOC and hazardous air pollutants in many cases have no specific emission limitation. In establishing the limits in the permit the Department relied on the best available information from USS (permit application certified by the responsible official to be true and accurate), the EPA (AP42) and/or stack test data to establish emission limitations at the maximum level of operation of the source. (When using AP42 data, 15% has been added to the emission factor to allow for variability.) If a source is being operated properly, emissions should not be above the maximum potential to emit. Also, Article XXI 2105.03 requires that all control equipment and equivalent compliance techniques be operated in accordance with good air pollution control practice. In the cases where emission limits were added, the Department is considering those levels to be RACT. The Department has revised the TSD to incorporate more information on how RACT was considered for NO_x, CO and VOC. MACT and NESHAPS were considered to be RACT for HAPs emissions in the permit.

In the case of NO_x RACT, USS provided information to the Department indicating NO_x emissions for numerous sources at the Edgar Thompson Plant. The determination was made that the emission levels/rates were RACT and that no additional control technology was required or feasible. This information was used to establish the NO_x emission limitations for the permit. Article XXI §2105.06.b.4 indicates the rate should be in terms of lb/hr maximum potential emissions.

Consequently, ACHD believes that it is not only feasible, but also appropriate to include emission limits in USS Edgar Thompson Operating Permit. This has been ACHD’s policy on other EPA-approved Major Source permits, other pre-Article XXI Major Source operating permits, minor source operating permits, and installation permits. ACHD will continue to employ this methodology.

2. **COMMENT:** In the draft Title V permit, ACHD has made references to incorrect regulatory citations and has incorrectly attempted to paraphrase an applicable requirement rendering the applicable requirements vague, ambiguous and incorrect. The correct regulatory citations must be referenced in the permit, as appropriate. In addition, when incorporating an applicable regulation in the permit, ACHD should either simply refer to the regulation; or copy the regulation into the permit as opposed to paraphrasing it. (1 Commenter)

RESPONSE: Section §2103.12.h of Article XXI, “Issuance, Standard Conditions” requires all permits to include the following with respect to compliance: “Consistent with the other requirements of this Article, compliance certification, testing, monitoring, reporting and record-keeping requirements sufficient to assure compliance with the terms and conditions of the permit.” ACHD is required to comply with this applicable regulation in all instances in the operating permit. Where specific regulatory language is insufficient to reasonably insure compliance with the permit due to site specific situations language has been added as required to meet the subject standard of issuance.

3. **COMMENT:** ACHD has created numerous new requirements that are beyond the scope of the Title V program and are not otherwise applicable requirements nor are they within ACHD's limited gap-filling authority. All new requirements that are not existing requirements and that are not necessary to assure compliance with an existing applicable requirement should be removed from the permit. (1 Commenter)

RESPONSE: Please refer to the Response to Comment No.1 above.

4. **COMMENT:** ACHD inappropriately includes what it refers to as maximum capacities throughout the permit and uses these values to impose limits that are frequently new and/or unverifiable. Therefore, all new requirements and the use of estimated production capacities that are not existing requirements and that are not necessary to assure compliance with an existing applicable requirement should be removed from the permit. All references to "Maximum Design Rates," "Maximum Capacities," and "Heat Input" should be replaced by "Nominal Throughput," "Nominal Throughput," and "Nominal Heat Input," respectively (1 Commenter)

RESPONSE: The Department used information provided by the permittee during discussions regarding this permit and provided by the permit application.

5. **COMMENT:** ACHD has not provided an applicable authority or sufficient basis for many new requirements and new limits established in the permit. Therefore, all newly created requirements that are not necessary to assure compliance with an existing applicable requirement should be removed from the permit. (1 Commenter)

RESPONSE: Please refer to the Response to Comment No.1 above.

6. **COMMENT:** The coke oven gas hydrogen sulfide concentration limits are unnecessary and inappropriate as applied to Edgar Thomson. Moreover, the Department arbitrarily and capriciously lowered concentration limit for combustion units to 35 from 40 grains per hundred dry standard cubic feet as prescribed in Article XXI §2105.21.h.4. Replace 35 grains per hundred dry standard cubic feet with 40 grains per hundred dry standard cubic where referenced in the permit. (1 Commenter)

RESPONSE: The Department recognized that U.S. Steel-ET is not a coke company and that it received its coke oven gas from U.S. Steel-Clairton plant. During the permitting process of U.S Steel-Clairton Plant C-battery, the battery was required to comply with the coke oven gas hydrogen sulfide concentration of 10 gr/100 dscf of §2105.21.h.2. Article XXI, §2105.21.h.4 requires that the coke oven gas from the remaining 10 existing batteries meet a sulfur compound concentration of 40 grains per 100 dry standard cubic feet of coke oven gas. However, since the By-Products Plant at the Clairton Works treats all the coke oven gas produced by the 10 batteries, Clairton coke plant is then required to comply with an average sulfur compound concentration of 35 grains per 100 dry standard cubic feet of coke oven gas.

The average sulfur compound concentration of 35 grains per 100 dry standard cubic feet of coke oven gas was derived using the design capacity, in terms of annual coal charge as the weighting factor for all batteries. The following table presents the results of this calculation:

Average H₂S Concentration with the Operation of C Battery

Battery	Annual Coal Charge tons	COG H ₂ S Conc. gr/100 dscf	Coal Charge X H ₂ S Concentration	Avg. H ₂ S Concentration gr/100 dscf
Nos. 1 - 3	1,553,805	40	62,152,200	
Nos. 13-15	1,637,025	40	65,481,000	
Nos. 19-20	2,004,580	40	80,183,200	
B	1,491,025	40	59,641,000	
C	1,379,059	10	13,790,590	
Total	8,065,494		281,247,990	34.87

Therefore, since Edgar Thomson plant is receiving or purchasing its COG from Clairton coke works, and Clairton coke works is subject to COG sulfur compound concentration of 35 grains per 100 dry standard cubic feet of coke oven gas, Edgar Thomson plant should also meet the COG sulfur compound concentration of 35 grains per 100 dry standard cubic feet of coke oven gas.

7. **COMMENT:** ACHD is requiring more emissions testing than is necessary or prescribed in Art XXI. For various units, the permit requires biennial emissions test and evaluations for NO_x, SO_x, and/or CO emissions citing Article XXI § 2108.02.b as authority. Section 2108.02.b, however, only prescribes biennial testing for units that have allowable emission rates, as defined in §2101.20 of this Article, of 100 or more tons per year of PM, SO_x, or VOC. Delete requirements for biennial testing for NO_x and CO and add language which authorizes the cessation of testing when allowable emission rates fall below 100 tpy. (1 Commenter)

RESPONSE: The Department cannot delete the testing frequency or add language which authorizes cessation of testing when allowable emission rates fall below 100 tpy as requested. The Department believes allowable emissions of NO_x, and CO are over 100 tons, which in turn warrant the biennial testing frequency. However, if after the facility performed the prescribed emission testing and evaluation and was discovered that the NO_x and CO emissions are below the major threshold, then the Department will reevaluate the frequency of testing requirements.

Citations/Typos

8. **COMMENT:** Condition V.A.1.o, Page 37; Condition V.D.1.l, Page 60; Condition V.E.1.l, Page 79. The language of the MACT has not been transferred to the draft Title V correctly. Conditions listed are inconsistent with §63.7810(c) and should be corrected. Revise Conditions to read: “You must develop a written startup, shutdown, and malfunction plan according to the provisions in § 63.6(e)(3)”. (1 Commenter)

RESPONSE: The MACT condition required the facility to develop a written startup, shutdown, and malfunction plan, and since the plan has already been developed, the Department believes that it should be referenced as it is in the permit. Therefore, the permit condition remains unchanged.

9. **COMMENT:** Condition V.A.1.p.1, Page 37; Condition V.D.n.1, Page 61. The language of the MACT has not been transferred to the draft Title V correctly. Conditions listed are inconsistent with §63.7826(a)(1) and should be read: “Prepared the capture system operation and maintenance plan according to the requirements of § 63.7800(b), including monthly inspection procedures and detailed descriptions of the operating parameter(s) selected to monitor the capture system.” (1 Commenter)

RESPONSE: As reiterated in response to comment 8, the MACT condition required the facility to prepare an operation and maintenance plan (O&M Plan) for the capture system and operate the system according to the prepared O&M Plan. Since the facility has already developed the plan, the Department believes that the condition should be worded to indicate that fact. Therefore, the permit condition remains unchanged.

10. **COMMENT:** Condition V.A.1.p.4, Page 37. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed should reference §63.7826(a)(4), not §63.7826(a)(1). Also, the condition listed is inconsistent with §63.7826(a)(4) and should read: Prepared a site-specific monitoring plan according to the requirements in § 63.7831(a). [§63.7826(a)(4)] (1 Commenter)

RESPONSE: The condition will not be revised because the MACT condition required the facility to prepare a site-specific monitoring plan and operate according to the prepared plan. Since the facility has already developed the plan, the Department believes that the condition should be worded to indicate that fact. However, the citation will be corrected.

11. **COMMENT:** Condition V.D.1.n.4, Page 61. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed is inconsistent with §63.7826(a)(4) and should read: “Prepared a site-specific monitoring plan according to the requirements in § 63.7831(a)” (1 Commenter)

RESPONSE: Please refer to the Response to Comment Nos.10 above.

12. **COMMENT:** Condition V.D.1.o.1, Page 61. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed is inconsistent with §63.7826(b)(1) and should read: Prepared the control device operation and maintenance plan according to the requirements of § 63.7800(b), including a preventative maintenance schedule and, as applicable, detailed descriptions of the corrective action procedures for baghouses and other control devices. (1 Commenter)

RESPONSE: The MACT condition §63.7826(b) says that the facility has demonstrated initial compliance if you prepare the control device operation and maintenance plan according to the requirements of §63.7800(b). It was the Department understanding that the plan had been prepared and it should be transferred to the permit. In addition, the Department believes that the rationale behind the MACT conditions §63.7800(b) and §63.7826(b) is not only to prepare the control device operation and maintenance plan, but to implement, operate and maintain the equipment as enumerated in the MACT condition §63.7800(b). Therefore, the condition remains unchanged.

13. **COMMENT:** Condition V.D.1.o.3, Page 61. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed is inconsistent with §63.7826(b)(3) and should read: Prepared a site-specific monitoring plan according to the requirements in § 63.7831(a) (1 Commenter)

RESPONSE: Please refer to the Response to Comment Nos. 12 above.

14. **COMMENT:** Conditions V.A.2.n.1, Page 41 & Condition V.D.2.q.1. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed are inconsistent with §63.7824(c)(1) and should read: Submit a written notification to the Administrator of your request to conduct a new performance test to revise the operating limit. (1 Commenter)

RESPONSE: The Department will make the changes by deleting the reference to the Administrator.

15. **COMMENT:** Conditions V.A.5.d.1 & V.A.5.d.2, Page 46 & Conditions V.E.5.d.1 & V.E.5.d.2, Page 86. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed are inconsistent with §63.7835(b)(1) &(2) and should read: (1 Commenter)

(1) Consistent with §§ 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with § 63.6(e)(1).

(2) The Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in § 63.6(e).

RESPONSE: The reference to the Administrator in the condition is also referring to the Department because the Department has been delegated authority by EPA to implement and enforce the requirements. Historically, all the facility's reports, be it MACT or NSPS has to be submitted to the local delegated authority and in some instances, copies are also sent to the EPA. However, the Department will remove the word Administrator.

16. **COMMENT:** Condition V.E.3.C, Page 82. The language of the MACT has not been transferred to the draft Title V correctly. Condition listed is inconsistent with §63.7831(a) and should read: For each CPMS required in § 63.7830, you must develop and make available for inspection upon request by the permitting authority a site-specific monitoring plan that addresses the requirements in paragraphs (a)(1) through (8) of this section. (1 Commenter)

RESPONSE: Please refer to the Response to Comment Nos. 1 **Error! Reference source not found.**0 above.

Facility Description

17. **COMMENT:** Section II, Facility Description: BOC Gases is independently owned and operated and should not be represented as a support facility. It's inaccurate to identify BOC Gases as a support facility for Edgar Thomson. BOC Gases is independently owned and operated and provides products to other businesses in addition to U. S. Steel. Remove the paragraph. (1 Commenter)

RESPONSE: Although the Department believes that BOC Gases is a support facility for U.S Steel-Edgar Thomson, but BOC Gases needs to show proof to confirm that it is independently owned and that it provides services to other businesses.

18. **COMMENT:** Section II, Table II-1: The draft Title V Permit contains an Emission Unit Identification Table with several errors. The errors in the Emission Unit Identification Table, including, but not limited to, those which are mentioned in the comments below, should be corrected. (1 Commenter)

Proposed Language: Table II-1 should be corrected as follows:

I.D.	Source Description	Control Device(s)	Nominal Throughput	Fuel/Raw Material	Stack I.D.
P001c	BFG Flare	N/A	3 MMcfh	BFG	S003
F002	Plant Roads	Wet Suppression; Chemical Treatment; Paved Road Sweeping	N/A	N/A	N/A
F003	BOP Slag Handling	None	350 tons/hr	Slag and Skulls from a BOP Steel Making Shop	N/S
N/A	WSAC (Mold Water) Cooling Tower	N/A	4,100 gpm	N/A	N/A
N/A	WSAC (Blast Furnace Closed Loop) Cooling Tower	N/A	2,145 gpm	N/A	N/A

RESPONSE: The Department will make the necessary changes as requested.

General Conditions

19. **COMMENT:** General Condition III.2.b, Page 15- and throughout the permit, including, but not limited to, all emission limitation tables where such a definition is provided. The draft permit contains an arbitrary definition of the term “year.” ACHD has never promulgated a definition of year. ACHD arbitrarily and capriciously has defined the term “year” as any twelve consecutive months, whereas the term year can also refer to a “calendar year,” the period between January 1 and December 31 each year. Delete condition 2.b on page 15 from the permit along with all similar references to the definitions of a year throughout the permit. (1 Commenter)

RESPONSE: All permits contain limits in terms of 12 consecutive months because an annual limit is not practically enforceable if stated on a calendar year basis. Therefore, no change to the permit has been made.

20. **COMMENT:** General Condition III.11, Page 17- Right to Access: Entry on to the permittee's premises should be conditioned on Department personnel and other federal, state, county, and local government representatives complying with permittee's safety requirements. Safety is U. S. Steel's primary core value, and the company operates under the guiding principle that all incidents can be prevented and the firm belief in personal responsibility. Add additional sentence to the end of condition 11 on page 17 to read as follows: (1 Commenter)

It shall not be a violation of this permit or Article XXI for the permittee to deny Department personnel and other federal, state, county, and local government representatives access to permittee's premises as authorized in this section if such personnel or representatives fail to comply with the permittee's safety requirements.

RESPONSE: This is Article XXI condition, and the Department cannot incorporate the requested sentence. Meanwhile, the Department takes the issue of safety very seriously, and if the facility believes that any Department personnel or federal government representative is blatantly ignoring the company's safety protocol, the facility should report the incident to the appropriate government agency. Therefore, the condition remains unchanged.

21. **COMMENT:** General Condition III.12.b, Page 17. The first annual certification date should be delayed due to the delay in permit issuance. The draft permit currently requires the first annual certification be submitted by March 31, 2014. With the delay in issuance, the certification will likely only cover a very short time period if issued this year, and perhaps no period if issued in 2015. Delaying the first annual certification to 2015 is more appropriate and will allow the permittee to institute the necessary procedures to ensure that the certification is accurate. Modify condition III.12.b. as follows: (1 Commenter)

All certifications of compliance must be submitted to the Administrator as well as the Department by March 31 of each year for the time period beginning January 1 of the previous year and ending December 31 of the previous year. The first report shall be due March 31, 2015 for the time period beginning on the issuance date of this permit through December 31, 2014.

RESPONSE: The permit has been revised.

22. **COMMENT:** General Condition III.13.b, Page 18. The Department arbitrarily and capriciously added record keeping requirements related to emission statements that are not prescribed in Article XXI § 2108.01.e. The first sentence in condition III.13.b requires the permittee to maintain and make available records that may be necessary to comply with the reporting and emission statements in Art. XXI § 2108.01.e. Such a requirement does not exist in Article XXI. Moreover, even assuming arguendo that such a record keeping requirement was proper, Section 2108.01.e.2 prescribes the information that must be included in the emissions statements and therefore only those records that are pertinent in development of that information should be needed to be kept. The Department added a record keeping requirement in the second sentence of III.13.b for "maintenance of production or pollution control equipment." Such information is not pertinent for the development of emission statements. Delete condition III.13.b on page 18, or, alternatively, delete the language "maintenance of production or pollution control equipment" in the second sentence. (1 Commenter)

RESPONSE: The Department will make the necessary changes.

23. **COMMENT:** General Condition III.15.d.3, Page 18. The first semi-annual deviation report date should be delayed due to the delay in permit issuance. Modify condition III.15.d.3 as follows: (1 Commenter)

If the permit is issued in 2013:

The first semiannual report shall be due July 31, 2014 for the time period beginning on January 1, 2014 through June 30, 2014.

If the permit is issued in 2014 before June 30:

The first semiannual report shall be due January 31, 2015 for the time period beginning on July 1, 2014 through December 31, 2014.

RESPONSE: The permit has been revised.

24. **COMMENT:** General Condition III.27, Page 21. The language of Article XXI §2104.08 was not transferred to the Title V correctly. The beginning of condition III.27 states “Compliance with the requirements of this *permit* shall not in any manner relieve any person...” (emphasis added). However, Section §2105.02 which the permit cites as its authority for the condition, reads “Compliance with the requirements of this *Part* shall not in any manner relieve any person...” (emphasis added). “Part” in section §2105.02 refers to Article XXI Part E – Source Emissions and Operating Standards. By changing “Part” to “permit” in the draft permit, the Department has substantially altered the meaning and scope of the referenced section and thereby arbitrarily created new requirements. Delete “permit” in the first line of condition III.27 on page 21 and replace with “Article XXI Part E”. (1 Commenter)

RESPONSE: The permit has been revised.

Site Level Terms and Conditions

25. **COMMENT:** Site Level Condition IV.2, Page 25 & Condition IV.9, Page 27. The conditions are duplicative. Condition IV.2 and Condition IV.9 are both seemingly aimed at preventing malodorous matter from becoming perceptible across the facility boundaries and even cite the same authority in Article XXI. Compliance with the first sentence of condition IV.9. is implied in condition IV.2 and its inclusion creates ambiguity. For efficiency and clarity the first sentence in conditions IV.9 should therefore be deleted and the remainder should be incorporated into condition IV.2. Delete condition IV.9, and modify condition IV.2 to read: (1 Commenter)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

RESPONSE: The permit has been revised.

26. **COMMENT:** Site Level Condition IV.8, Page 27. The draft Title V Permit does not include a reference to the permittee's existing waiver of the cold start notification. Condition IV.8 should be removed from the permit. Alternatively, Condition IV.8 should make reference to the existing waiver obtained from the Department. (1 Commenter)

RESPONSE: There is no requirement to include the waiver in a permit. Placing this condition in the permit would require a permit revision to allow a waiver or to reinstate the cold start requirement which we do not believe is the intention of the regulation. U.S. Steel Edgar Thomson Plant received a waiver from cold start reporting (within 24 hours) for Riley Boilers No. 1-3 on April 12, 2002. This waiver continues to remain in effect until the Department notifies USS in writing that it has been cancelled.

27. **COMMENT:** Site Level Condition IV.15, Page 29. The condition does not accurately reflect the Federal Regulation which it cites as authority. 40 CFR Part 82 must be read as whole as there exists several exemption and qualifications in its applicability. The Department's attempt to summarize the applicable requirements in condition 15 creates a potential for conflict between the permit and the federal regulation. For efficiency and clarity condition 15 should merely require compliance with 40 CFR Part 82. Delete condition IV.15.a, b, c, d, and e and insert: (1 Commenter)

The permittee shall comply with 40 CFR Part 82 where applicable.

RESPONSE: The Department will delete condition IV.15.a & c.

28. **COMMENT:** Site Level Condition IV.26, Page 33. The condition is ambiguous and is incorrectly identified as a Site Level Condition. Subpart FFFFF only applies to certain emission units. While U. S. Steel agrees that Article XXI §2104.08.a, incorporates 40 CFR Part 63, Subpart FFFFF by reference, the condition should be deleted since many provisions of Subpart FFFFF do not apply to the Edgar Thomson plant. Furthermore, the applicable provisions of Subpart FFFFF are already appropriately included in the applicable emission unit level terms and conditions. Delete condition IV.26. (1 Commenter)

RESPONSE: The permit has been revised.

29. **COMMENT:** Site Level Condition IV.27.b, Page 33. The condition is duplicative and unnecessary. Compliance with condition IV.27.b is implicit with condition IV.27.a and its inclusion in the permit creates ambiguity. For efficiency and clarity IV.27.b should be deleted. (1 Commenter)

RESPONSE: The permit has been revised.

Blast Furnace No. 1 and Blast Furnace No. 3

30. **COMMENT:** Condition V.A.1.q, Page 38. Condition V.A.1.q contains an hourly and an annual emission limit. The annual limit is not based on 8760 hours of operation. Revise Condition V.A.1.q so the PM, PM-10, and PM2.5 emissions limits are "236.87 tons/year". (1 Commenter)

RESPONSE: The permit has been revised to 213.17 tons per year.

31. **COMMENT:** Condition V.A.2.a, b & c, Page 39. The testing frequencies are not defined correctly. Testing frequencies required for parameters where there is no limit (condensable PM, NO_x, and CO) should not be set as per the Article XXI biennial testing requirement. USS is performing testing to develop emission factors and future limits. Testing frequencies should be set after this process is complete, as some parameters may not require biennial testing. In addition, although there is no allowable limit currently set for SO_x, USS has previously agreed to the biennial testing schedule. Finally, the test methods listed in condition b should be moved to condition f. (1 Commenter)

Revise condition V.A.2.a to read:

“The permittee shall perform emission tests for exhaust gas PM, PM₁₀ and PM_{2.5}, concentrations (gr/dscf) and equivalent emission rates (lb/hr) at the No. 1 and No. 3 Blast Furnace Casthouse Baghouse to demonstrate compliance with conditions V.A.1.g, V.A.1.q, and V.A.1.t above. The PM, PM₁₀ and PM_{2.5} testing shall be repeated at least once every two years from the date of the most recent valid test. The testing shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02 or another Department approved test method. (§2103.12.h.1; §2103.12.i; §2108.02)

Delete condition V.A.2.b.

Revise condition V.A.2.c to read:

The permittee shall perform emissions tests and evaluations for condensable PM, SO_x, NO_x, CO, VOC and HCL on Blast Furnaces No. 1 and 3 Casthouse Baghouse to develop emission factors that can be applied to quantify condensable PM, SO_x, NO_x, CO, VOC and HCL emissions. Testing for condensable PM, SO_x, NO_x, CO, VOC and HCL shall be conducted in accordance with approved EPA Methods in Appendix A of 40 CFR Part 60, Article XXI §2108.02 or another Department approved test method. (§2103.12.h.1; §2108.02.b, §2108.02.e.).

RESPONSE: The Department cannot revise the conditions as requested. The condition says “the permittee shall perform the test/evaluation at least once (i.e. one time, minimum) in two years. For the purpose of this emission test and evaluation”. The facility is not restricted to only one test in two years or two tests in four years; it is allowed to perform as many test/evaluation within the course of the permit term that is sufficient to adequately evaluate the emissions. In addition, the Department believes that the allowable emissions of NO_x, CO and SO_x are over 100 tons, which in turn warrant a minimum two year test frequency.

32. **COMMENT:** Condition V.A.2.m, Page 41. The language of the MACT has not been transferred to the draft Title V correctly. Condition V.A.2.m is inconsistent with §63.7824(a) and should be corrected and should read: (1 Commenter)

“For each capture system subject to an operating limit in § 63.7790(b)(1), you must certify that the system operated during the performance test at the site-specific operating limits established in your operation and maintenance plan using the procedures in paragraphs (a)(1) through (4) of this section”

RESPONSE: The Department believes that it is more appropriate to address/mention the equipment or emission control device that the condition is applied to, as it is written in the permit. Therefore, the condition remains unchanged.

33. **COMMENT:** Condition V.A.2.n.1, Page 41. The MACT regulation only requires that a permittee submit a notification to change an operating limit to the Agency responsible for overseeing the Title V Air Permit. (1 Commenter)

Revise Condition V.A.2.n.1) to read:

- a. Submit a written notification to the Department of your request to conduct a new performance test to revise the operating limit.

RESPONSE: The permit has been revised.

34. **COMMENT:** Condition V.A.3.c, Page 42. The laboratory performing the analysis is sending the sample to a different branch office that uses a different ASTM test method. To alleviate changing commercial issues with contracted Laboratories, USS should have the flexibility to use a different test method, provided the test method is approved by an accrediting Board or an Agency, without first having to seek approval from the Department. (1 Commenter)

Revise Condition V.A.3.c to read:

The permittee shall measure the total sulfur content of the blast furnace gas combusted at the facility. The sulfur content of BFG shall be determined by obtaining and analyzing samples of BFG produced at the blast furnaces at a sample location downstream of the gas cleaning system but prior to a combustion source. The sulfur content shall be determined by analyzing the sample for volumetric concentrations of trace sulfur compounds in the BFG using an ASTM certified, US EPA, (or other Department approved test method). Testing shall be conducted monthly commencing nine (9) months after permit issuance or at an alternative frequency as necessary with approval of the Department. The permittee may skip to quarterly testing after three (3) consecutive months of compliance with the monthly testing. (§2103.12.h.5.B)

RESPONSE: The Department cannot revise the condition as requested. The facility can produce or suggest a specific test method(s) and will be incorporated into the permit condition.

35. **COMMENT:** Condition V.A.3.j, Page 43. The condition incorrectly refers to the No. 1 and No. 3 Blast Furnace Casthouse emission control system instead of the Blast Furnace process. As written, the condition requires that the continuous monitor for the Casthouse Baghouse must collect data while the Casthouse Baghouse is operating. The MACT regulation requires that continuous monitors must collect data while the process is running. If the process is shutdown, then there is no requirement to collect data, and in fact, certain sections of the MACT prohibit the collection of continuous monitoring data to raise averages when the process is idle. (1 Commenter)

Revise Condition V.A.3.j to read:

Except for monitoring malfunctions, out-of-control periods as specified in §63.8(c)(7), associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must monitor continuously (or collect data at all required intervals) at all times the No. 1 and or No. 3 Blast Furnace is operating. [§2103.12.i; §63.7832(a)]

RESPONSE: The permit has been revised.

36. **COMMENT:** Condition V.A.3.m.3, Page 43. The frequency for MACT compliance testing is incorrectly cited as every 2 years. The MACT regulation, as per 63.7821 requires compliance testing to be conducted once during the term of the Title V Permit and only for PM. (1 Commenter)

Revise Condition V.A.3.m.3) to read:

Conducting subsequent performance tests for PM once during the term of the Title V Permit. [§2108.02; §2103.12.h.1; Table 3, Item 7.c, 40 CFR 63, Subpart FFFFF]

RESPONSE: The Department cannot revise the condition as requested because there is no reason to incorporate two different testing frequencies for the same operation because it creates ambiguity. The Department believes that compliance with the article XXI testing of condition V.A.2.a is compliance with MACT testing frequency. In addition, The Department will incorporate a sentence in the TSD that says “testing for the MACT grain loading condition shall be once every five years”.

37. **COMMENT:** Condition V.A.4.a.1, Page 44. The requirement to record fan motor amperage should be re-written to allow flexibility in choosing a different parametric monitoring option, to avoid having to seek a Permit Modification to do this. The language as written does not reflect the MACT language, which states the limit is an hourly average. The MACT regulation allows several options when choosing a parametric monitoring parameter, and fan amps is one option. As the Draft Permit is written, if a different parameter were to be used USS would need to seek a Title V Permit modification to do so, which is contrary to the MACT requirements. In addition, the frequency of monitoring must be correctly referenced as an hourly average. (1 Commenter)

Revise Condition V.A.4.a.1) to read:

Records to demonstrate compliance with parameter chosen in accordance with V.A.1.1 and V.A.3.d;

RESPONSE: Steel MACT condition §63.7800(b)(3)(i) required the facility to select operating limit parameters appropriate for the performance of the capture system. Appropriate operating limit parameters include total volumetric flow rate, fan motor amperage, or static pressure. In addition Condition §63.7790(b)(1) (TV permit condition V.A.1.j) also required the facility to operate the capture system at or above the lowest value settings established for the operating limit in the operation and maintenance plan.

The Department & U.S Steel agreed that the requirements provided options to choose the parametric monitoring to determine compliance as stated above, and U.S. Steel has selected fan motor amperage as established in its operation and maintenance plan as the monitoring parameter to determine compliance with capture system. The TVOP should reflect the actual monitored parameter. However, pursuant to condition V.A.2.n [§63.7824(c)], the facility may change the operating limit which would require a stack test. Therefore, the condition remains unchanged.

38. **COMMENT:** Condition V.A.4.a.3, Page 44. The requirement to keep all control equipment inspections and any maintenance required is vague and could result in overly cumbersome recordkeeping to satisfy this condition. USS believes the intent of this condition is to ensure adequate records that pertain to inspections and maintenance, as required by this permit, are kept. This is

reasonable and consistent with Article XXI and MACT requirements. Since the language is vague, it could be construed that even a casual inspection not required by this Permit or minor maintenance not impacting compliance must be documented. This would be confusing and cumbersome. (1 Commenter)

Revise Condition V.A.4.a.3) to read:

Records of all control equipment inspections required by this permit and any maintenance required as per these inspections necessary to maintain compliance with the conditions of this permit.

RESPONSE: The permit has been revised.

39. **COMMENT:** Condition V.A.4.b.2, Page 44. Slag ladles are no longer used at the Blast Furnace and reference to gas lances at these locations should be deleted. The permit should reflect current conditions and operating practices. (1 Commenter)

Revise Condition V.A.4.b.2) to read:

Daily recordings of the amount of gas used by the gas lances at the iron ladle area and iron and slag gates (also referred to as dams and/or diverters).

RESPONSE: The permit has been revised.

40. **COMMENT:** Condition V.A.5.a.1, 3 and 5, Page 45. The reporting requirements do not match the record keeping requirements in Section V.A.4.a and in some cases are duplicates of the same record. Slag ladles are no longer used at the Blast Furnace. USS believes the records required to be reported in section V.A.5 should align with the records required to be kept in V.A.4. Gas used for iron oxide fume suppression is the same gas used at the iron and slag gates and the iron ladles. The fuel used for the Blast Furnace is the same as that injected into the Blast Furnace through the tuyeres. Slag ladles are no longer used at the Blast Furnace and reference to gas lances at these locations should be deleted. (1 Commenter)

Revise Condition V.A.5.a to read:

1. Total monthly hot metal produced per furnace;
2. The total amount and type of fuel injected into the blast furnace through the tuyeres used at the blast furnace;
3. The total amount and type of additional fuel used in iron oxide fume suppression, COG railcar thaw lines, torpedo car cleaning and ladle drying and firing; and
4. Non compliance information required to be recorded by V.A.4.c above.

RESPONSE: The Department will delete condition V.A.5.a.1 and also delete slag ladle from condition V.A.5.a.3.

41. **COMMENT:** Condition V.A.6.c and f, Page 50. Both these sections reference the BOP Shop and the BOP Shop Secondary emission capture and control system. Reference to the BOP Shop should be deleted from the Blast Furnace Section of the Permit. (1 Commenter)

RESPONSE: The permit has been revised.

Basic Oxygen Process Shop

42. **COMMENT:** Condition V.D.1.a.1-4, Page 58. The conditions contain the requirement that emissions from the specific sources “shall be captured” or “shall be collected”. These restrictions are not part of any underlying permit or part of an existing standard. These statements are ambiguous, vague, and could be misinterpreted to mean 100% capture or collection. (1 Commenter)

Eliminate Condition V.D.1.a or revise to read:

The permittee shall at no time operate the BOP Shop while generating particulate emissions unless the subject equipment is properly maintained and operated in accordance with the following: (§2101.05.a.1; §2103.12.a.2.B)

- a. *Emissions from the hot metal mixer, direct pour station, charging ladle and metal desulfurization station shall be ~~captured~~ **controlled** by movable hood car and mixer fixed hood and directed to the BOP Mixer & Desulfurization Baghouse;*
- b. *Emissions from hot metal slag skimming and BOP Vessel F and R charging, tapping and slag dumping shall be ~~collected~~ **controlled** by the charging aisle and furnace aisle roof canopies or charging hoods and directed to the BOP Secondary Baghouse;*
- c. *Emissions from flux railcar hopper, BOP flux material transfer tower, BOP flux material internal conveying/transfer No.1, and BOP flux material internal conveying/transfer No.2 shall be ~~collected~~ **controlled** and directed to a respective dedicated baghouse;*
- d. *Emissions from oxygen blowing at BOP Vessels F and R shall be ~~captured~~ **controlled** by a water cooled hood above each Vessel and directed to the BOP Shop Gas Cleaning Venturi Scrubber.*

RESPONSE: The permit has been revised.

43. **COMMENT:** Condition V.D.1.m, Page 60. Condition V.D.1.m contains the MACT initial compliance demonstration requirement. The language of the MACT has not been transferred to the draft Title V correctly. Condition V.D.1.m is inconsistent with §63.7825(a) and should be corrected. (1 Commenter)

Revise Condition V.D.1.m to read:

*“For each affected source subject to an emission or opacity limit in Table 1 of 40 CFR 63 Subpart FFFF, the permittee shall have demonstrated **initial** compliance if: [§63.7825(a)]”*

RESPONSE: The permit has been revised.

44. **COMMENT:** Condition V.D.1.m.1.A & C, Page 60. Condition V.D.1.m.1.A & V.D.1.m.1.C contains MACT requirements. The language of the MACT has not been transferred to the draft Title V correctly. (1 Commenter)

Revise Condition V.D.1.m.1.A to read:

“The average concentration of particulate matter from a BOP ~~Secondary Baghouse~~ Primary emission control system applied to emissions from a BOP with an open hood system, measured according to the performance test procedures in Condition V.D.2.g below, did not exceed 0.02 gr/dscf. [Table 2, Item 9.b of 40 CFR Part 63, Subpart FFFFF] “

Revise Condition V.D.1.m.1.C to read:

“The average concentration of particulate matter from a ~~BOP Secondary Baghouse~~ and BOP Mixer & Desulfurization Baghouse applied to emissions from hot metal transfer, skimming, or desulfurization, measured according to the performance test procedures in Condition V.D.2.h below, did not exceed 0.01 gr/dscf. [Table 2, Item 10 of 40 CFR Part 63, Subpart FFFFF]”

RESPONSE: The permit has been revised.

45. **COMMENT:** Condition V.D.1.p, Table V-D-1, Page 61. Condition V.D.1.p contains emission limitations for BOP Shop that includes stacks S005 through S008. Condition V.D.1.p should only include stacks S006 through S008. In addition the **footnote below table V-D-1 should be deleted. Condition V.D.1.p states that the emission limitations in Table V-D-1 apply to the sum of “all point (stacks S005 through S008) and fugitive emissions.” These units are not all part of the BOP Shop process as it is defined by Article XXI. The stacks, including air pollution control device outlets, associated with the BOF process are S006, S007, and S008. These are the stacks associated with the BOP Secondary Baghouse (S006) and the BOP Primary Gas Cleaning System (S007 and S008).

The other stacks listed in V.D.1.p (S005, S009) are not associated with the process as it is defined in Article XXI and should not be included in this Condition. U. S. Steel’s position is in agreement with the 1999 Consent Decree which, in Exhibit 2, clearly states how §2104.02.c.9.b should be applied at the BOP Shop. (1 Commenter)

Mixer Emission Control System

For the purpose of demonstrating compliance, the emissions associated with the Mixer Emission Control System will be compared to the particulate limit of 7 lb. per hour. This limitation is contained in Article XXI, Section 2104.02.b. The 7 lb. per hour limit applies to iron transfer and desulfurization emissions, which are controlled by the Mixer Emission Control System.”

RESPONSE: The permit has been revised, and condition V.D.1.s has been added to reflect emissions Table V-D-3 for BOP Mixer and Desulfurization.

46. **COMMENT:** Condition V.D.1.r, Page 62. The draft Title V contains the Article XXI requirement (§2104.02.c.9) for particulate mass emissions from the steel making process. This requirement is applicable; however, the language has been significantly altered for its inclusion in the Title V. It is essential that it be included in the Title V in its original language to preserve the regulatory intent. (1 Commenter)

Revise Condition V.D.1.r to read:

“No person shall operate any [primary steel production process] in such manner that emissions of particulate matter from such process exceed at any time the rate determined by the formula set forth below.

RESPONSE: The condition will be revised by deleting the reference to BOP Shop.

47. **COMMENT:** Condition V.D.2.a, Page 62. The draft Title V requires biennial testing for equipment that is not required to be tested under §2108.02. Under §2108.02, only emission units with allowable particulate emission rates greater than 100 tons per year must be emission tested. Stacks S005 (BOP Mixer & Desulfurization Baghouse) has an allowable particulate emission rate that is less than 100 tons per year; therefore, this baghouse should be exempt from testing requirements. In addition, Stacks S007 and S008 (BOP primary scrubber stacks) do not operate at the same time as they back-up each other. Only the operating stack should be tested at the time of the biennial test. (1 Commenter)

Revise Condition V.D.2.a to read:

“The permittee shall perform emission tests for exhaust gas PM concentrations (gr/dscf) and equivalent lb/hr emission rates and plume opacity at stacks S006 and S007 or S008 in accordance with Site Level Condition IV.12 above and §2108.02. The testing shall be repeated at least once every two years. [§2108.02 and §2103.12.h.1]”

RESPONSE: The Department will review it and make necessary changes. But it will not incorporate the sentence stack S007 or S008 because the permittee has the ability to use either of the stack at will during operations, and therefore, the testing should include both stacks.

48. **COMMENT:** Condition V.D.2.c, Page 62. The draft Title V contains ambiguous language regarding baghouse performance testing. Also, the stated testing frequency does not correspond with the testing frequency required by MACT. The language of Condition V.D.2.c is ambiguous. It should be revised to clarify that this requirement only applies to baghouses with MACT grain loading limits. Additionally, the frequency of the testing has been arbitrarily increased to once every two years. §63.7821(c) only requires testing “no less frequently than once during each term of your title V operating permit.” (1 Commenter)

Revise Condition V.D.2.c to read:

“For the BOP Secondary Baghouse and Mixer Baghouse, the permittee must conduct subsequent performance tests no less frequently than once during each term of the Title V operating permit. [§2103.12.h; §63.7821(c)]”

RESPONSE: The Department will revise the testing requirements for the BOP Mixer and desulfurization baghouse. The BOP secondary baghouse, which is designated as S006 has already been covered by the emission limit in condition V.D.1.q and the testing in condition V.D.2.a.

49. **COMMENT:** Condition V.D.2.j, Page 64. Condition is redundant to condition V.D.2.i and has an inappropriate citation. Condition V.D.2.j is inconsistent with §2108.02.c, is redundant to condition V.D.2.i, and should be deleted. (1 Commenter)

RESPONSE: The permit has been revised.

50. **COMMENT:** Condition V.D.2.q.1, Page 65. This condition requires notification to the Department and the Administrator of the request to conduct a new performance test to revise the operating limits.

The language of the MACT has not been transferred to the draft Title V correctly. Condition V.D.2.q.1 is inconsistent with §63.7824(c)(1) and should be corrected. (1 Commenter)

Revise Condition V.D.2.q.1 to read:

Submit a written notification to the Department of your request to conduct a new performance test to revise the operating limit.”

RESPONSE: The permit has been revised.

51. **COMMENT:** Condition V.D.3.d, Page 66. The draft Title V contains ambiguous language regarding inspections to be conducted at baghouses. The language of Condition V.D.2.d is ambiguous. It should be revised to clarify that this requirement applies only to the baghouses that are subject to §63.7830.b.4. (1 Commenter)

Revise Condition V.D.3.d to read:

“The permittee shall conduct inspections of the BOP Secondary Baghouse and Mixer Baghouse at the specified frequencies according to the following requirements. [§2103.12.i; §63.7830(b)(4)]”

RESPONSE: The permit has been revised.

52. **COMMENT:** Condition V.D.3.p.1.c, V.D.3.p.2.b & V.D.3.p.3.b, Page 68. These conditions of the draft Title V stated testing frequency does not correspond with the testing frequency required by MACT. The frequency of the testing has been arbitrarily increased to once every two years. §63.7833(a) Table 3, Item 9 & Item 10 & Item 12 only requires testing according to “Conducting subsequent performance tests at the frequencies specified in § 63.7821”. (1 Commenter)

Revise The Conditions to read:

“Conduct subsequent performance tests no less frequently than twice (mid-term and renewal) during each term of the Title V operating permit.”

RESPONSE: The Department will only revise condition V.D.3.p.2.b, which is for the Mixer baghouse, to correspond with the testing frequency requirement in condition V.D.2.c. The Department cannot revise condition V.D.3.p.1.c and V.D.3.p.3.b testing frequency as requested because there is no reason to incorporate two different testing frequencies for the same operation because it creates ambiguity. The Department believes that compliance with the article XXI testing of condition V.D.2.a is compliance with MACT testing frequency

53. **COMMENT:** Condition V.D.5.e, Page 72. The draft Title V contains ambiguous language regarding notifications not consistent with §63.7825.c. In addition, the condition refers to V.D.5.h which is inappropriate. The language of Condition V.D.5.e is ambiguous. It should be revised to clarify that this requirement applies only to the initial compliance notification. (1 Commenter)

Revise Delete Condition V.D.5.e or revise to read:

“For each emission limitation in Conditions V.D.1.f through V.D.1.h above, the permittee must submit an **initial** notification of compliance status ~~according to V.D.5.h below~~. [§2103.12.k.1; §63.7825(c)]

RESPONSE: The permit has been revised.

Ladle Metallurgical Facility

54. **COMMENT:** Condition V.E.1.a, Page 78. The permit unnecessarily includes a requirement that the LMF and LMF baghouse must be operated to conform to the County Opacity Regulation while more stringent requirements are also included in the permit. Condition V.E.1.a adds an unnecessary condition to the Title V Permit. The LMF and LMF baghouse are subject to more stringent opacity regulations per IP0051-I005 and these conditions are outlined in conditions V.E.1.e and V.E.1.f, therefore it is not necessary to list a less stringent regulation as a requirement. Additionally, condition V.E.1.a specifically references the 1999 Consent Decree (Civil Action 99-1783). This citation has no bearing on the LMF baghouse or proper maintenance and operation of equipment. Also, citation §2109.06 contains language about enforcement, of which, the LMF baghouse was not subject to Civil Action 99-1783. *Eliminate Condition V.E.1.a.* (1 Commenter)

RESPONSE: The permit has been revised.

55. **COMMENT:** Condition V.E.1.b, Page 78. Condition V.E.1.b contains the requirement that emissions from the LMF Vessel and flux/alloy handling system shall be “treating all particulate emissions”. This restriction is not part of an existing standard. The statement is ambiguous, vague, and could be misinterpreted to mean 100% capture or collection. (1 Commenter)

Revise Condition V.E.1.b to read:

*The permittee shall at no time, operate or allow to be operated, LMF Vessel and flux/alloy handling system unless the hood for capturing emissions from the vessel and ductwork connecting the capture hoods to the baghouse are in place and operating, ~~treating all~~ **controlling** particulate emissions from the LMF Vessel and flux/alloy handling system. [IP 0051-I005, Condition V.A.1.a]*

RESPONSE: The permit has been revised.

56. **COMMENT:** Condition V.E.1.m.1, Page 79. Condition V.E.1.m.1 contains an incorrect particulate matter limit for the LMF baghouse. It also contains a reference to an inappropriate table in the MACT. Condition V.E.1.m.1 contains a particulate limit of 0.005 gr/dscf. IP0051-I005 states under restriction V.A.1.e that emissions from the LMF baghouse are subject to a limit of 0.0052 gr/dscf. The condition should be changed to reflect the correct limit. Condition V.E.1.m.1 specifically references Table 2 (initial compliance limits) of 40 CFR 63 subpart FFFFFF. Table 3 Item 11 (continuous compliance limits) of 40 CFR 63 subpart FFFFFF states that LMF limits are 0.01 gr/dscf. Also, the citation should be removed or revised to that if the MACT is referenced; it specifically references Table 3 Item 11 and not Table 2. (1 Commenter)

RESPONSE: The initial compliance condition has been removed from the permit in its entirety.

57. **COMMENT:** Condition V.E.1.n, Page 79. Condition V.E.1.n contains emission limitations that lump the LMF operations into the BOP Shop under condition V.D.1.p and includes LMF stack S009. Condition V.D.1.p should only include stacks S006 through S008. (1 Commenter)

The March 13, 2009 installation permit issued for the LMF baghouse, #0051-I005, does not create nor lump emissions with other sources in the BOP Shop. Instead, V.A.1.j states:

Emissions from the outlet of the LMF Emission Control Baghouse shall not exceed the emission limitations in Table V-A-1 at any time. [§2102.04.b.6]:

Table V-A-1 - LMF Baghouse Emission Limitations

POLLUTANT	lbs/hr	tons/yr 1
Particulate Matter (filterable)	5.12	22.43
PM-10 (filterable)	5.12	22.43
PM-2.5 (filterable)	5.12	22.43

1 A year is defined as any 12 consecutive months.

Proposed Language:

Eliminate Condition V.E.1.n

RESPONSE: The permit has been revised.

58. **COMMENT:** Condition V.E.2.a, Page 80. Condition V.E.2.a lists a requirement to test for condensable particulate matter every two years. IP0051-I005 and the proposed Title V list only filterable compliance limits. Also, testing is required every two years. The source has a potential to emit limit of 22.43 tons/year of particulate matter, far below the biennial testing requirement of 100 tons/year as mentioned in §2108.02.b of Article XXI. Given the increasing cost of testing sources in a competitive industry, the condensable particulate matter test does not add a benefit to facility compliance. Condition V.E.2.a should remove condensable particulate matter. (1 Commenter)

The citations §2108.02.b and 40 CFR §63.7821(c) state that the MACT requires testing once every term of the Title V Permit, and Article XXI only requires testing every two years for sources with an allowable emission rate of greater than or equal to 100 tons per year. The LMF baghouse should be subject to the MACT requirement. Given the source has an allowable emission rate of 22.43 tons/year, it would not be subject to §2108.02.b

Instead, 40 CFR §63.7821(c) should be followed as stated:

“(c) For each emissions unit equipped with a baghouse, you must conduct subsequent performance tests no less frequently than once during each term of your title V operating permit.”

Proposed Language:

*The permittee shall perform emission tests for exhaust gas PM concentrations (gr/dscf) and equivalent lb/hr emission rates and plume opacity at stack S009 in accordance with Site Level Condition IV.12 and §2108.02 to demonstrate compliance with Conditions V.E.1.c, V.E.1.e, and V.E.1.o above. ~~The testing shall include condensable PM and shall be repeated at least once every two years.~~ **The testing shall be repeated no less frequently than once during each term of the title V operating permit.** [§63.7821(a); §63.7821(c); ~~§2108.02~~; §2103.12.h.1; ~~and IP-0051-I005, Condition V.A.2.a~~].*

RESPONSE: The Department cannot dismiss the fact that the testing conditions and authority to test for condensable is initiated by installation permit IP-0051-I005, condition V.A.2.a, and therefore cannot delete the conditions. The installation permit needs to be amended before it can reflect different conditions in the Title V permit.

59. **COMMENT:** Condition V.E.2.c.1.F, Page 80. Condition V.E.2.c.1.F for condensable testing should be clarified based on comment four. (1 Commenter)

Revise Condition V.E.2.c.1.F to read:

Method 202, as applicable, to determine condensable PM or PM_{2.5}.

RESPONSE: The facility is required to test for condensable PM by condition V.E.2.a (IP-0051-I005, Condition V.A.2.a), and the condition cannot be revised at this time.

60. **COMMENT:** Condition V.E.3.k.1.B, Page 83. Testing in condition V.E.3.k.1.B is required every two years. The source has a potential to emit limit of 22.43 tons/year of particulate matter, far below the biennial testing requirement of 100 tons/year as mentioned in §2108.02.b of Article XXI. The below citations of §2108.02.b and 40 CFR §63.7821(c) state that the MACT requires testing once every term of the Title V Permit, and Article XXI only requires testing every two years for sources with an allowable emission rate of greater than or equal to 100 tons per year. The LMF baghouse should be subject to the MACT requirements. (1 Commenter)

Also, Article XXI §2108.02.b states:

“b. On or before December 31, 1981, and at two-year intervals thereafter, any person who operates, or allows to be operated, any piece of equipment or process which has an allowable emission rate, as defined in §2101.20 of this Article, of 100 or more tons per year of particulate matter, sulfur oxides or volatile organic compounds shall conduct, or cause to be conducted, for such equipment or process such emissions tests as are necessary to demonstrate compliance with the applicable emission limitation(s) of this Article and shall submit the results of such tests to the Department in writing. Emissions testing conducted pursuant to this Subsection shall comply with all applicable requirements of Subsection e below.”

Given the source has an allowable emission rate of 22.43 tons/year, it would not be subject to §2108.02.b

Instead, 40 CFR §63.7821(c) should be followed as stated:

“(c) For each emissions unit equipped with a baghouse, you must conduct subsequent performance tests no less frequently than once during each term of your title V operating permit.”

Revise Condition V.E.3.k to read:

The permittee shall demonstrate continuous compliance with the ladle metallurgy operation subject to an emission or opacity limit in Conditions V.E.1.c above by meeting the following requirements: [§2103.12.i; §63.7833(a), Table 3-11 & 12; and IP 0051-I005, Condition V.A.3.d]

For each ladle metallurgy operation at the BOP shop: [§2103.12.i; §63.7833(a), Table 3, Item 11]

- A. *Maintain emissions of particulate matter from a control device at or below 0.01 gr/dscf; and*
- B. *For each emissions unit equipped with a baghouse, you must conduct subsequent performance tests no less frequently than once during each term of your title V operating permit. ~~Conduct subsequent performance tests no less frequently than once every two years [§63.7833(a)Table 3, Item 11.b and § 63.7821]~~*

RESPONSE: The permit condition cannot be revised at this time. Please see response to comment 36

61. **COMMENT:** Condition V.E.3.m, Page 84. Condition V.E.3.m states that the pressure measurement on the collection hood will be recorded once per shift in accordance with permit 7035003-002-93900 condition 6. The cited permit condition does not specify the recording frequency and the assigned frequency of once per shift is too restrictive and overly burdensome. Recording pressure measurement on the collection hood once per shift is overly burdensome. The frequency of recording pressure measurement on the collection hood wasn't specified in the referenced permit requirement (Permit No. 7035003-002-93900, condition 6). Additionally, the frequency of recording pressure once per shift contradicts condition V.E.4.b.3, which requires the pressure reading of the LMF Baghouse collection hood to be recorded once per day. The frequency of record keeping should be consistent between the two conditions and condition V.E.3.m and should be updated to require a more reasonable reporting frequency of once per day. (1 Commenter)

Revise Condition V.E.3.m to read:

When operating, the permittee shall monitor and record once per ~~shift~~ day the pressure measurement to demonstrate compliance with the collection hood negative pressure requirement of condition V.E.1.h above. (Permit No. 7035003-002-93900, condition 6, issued March 1, 1994; §2101.05.a.1)

RESPONSE: The Department does not believe that taking a pressure measurement every shift is a burden. Ensuring that the collection hood maintains a negative pressure at all times is considered to be part of the proper operation and is intended to minimize emissions.

62. **COMMENT:** Condition V.E.3.n, Page 84. Condition V.E.3.n requires visible emissions notation to occur on the LMF baghouse and requires that the individual monitoring visible notations record whether the emissions extend beyond the property line. The LMF baghouse is a regulated point source within 40 CFR 63 Subpart FFFFF and IP0051-I005 and not a fugitive source of emissions, it

does not have a requirement that emissions not extend beyond the property line. The condition requiring such recording should be rephrased so that the individual monitoring visible notation does not extend beyond the property line. (1 Commenter)

Revise Condition V.E.3.n to read:

Notations of visible emissions from the LMF Baghouse stacks shall be performed once per quarter during normal daylight operations. A trained individual shall record whether any emissions are observed ~~and whether these emissions extend beyond the facility property line.~~ (§2103.12.h.1)

RESPONSE: The permit has been revised.

63. **COMMENT:** Condition V.E.3.o, Page 84. Condition V.E.3.o states that quarterly inspections shall be performed on the “LMF small baghouse”. A more understood term for easier interpretation would be the “LMF dust collectors”. The LMF dust collectors are more understood within the facility and are cited on the LMF equipment table under P004-3 and P004-4. (1 Commenter)

Revise Condition V.E.3.o to read:

*Quarterly visual inspections of the LMF ~~small baghouse~~ **dust collectors** to ensure that the equipment is operating properly and that the integrity of the control equipment exhausts systems are not compromised by damage, malfunction or deterioration. Repairs shall be made as soon as practicable to correct obvious failures or deficiencies. (§2103.12.h.1)*

RESPONSE: The permit has been revised.

Dual Strand Continuous Caster

64. **COMMENT:** Condition V.F.3.c, Page 90. Condition V.F.3.c states that Method 22 visible notations will be performed on a stack that discharges into the caster spray chamber. Furthermore, Method 22 per EPA method instructions is intended on fugitive emission sources and not point sources. The caster baghouse stack is taken to be mold flux baghouse mentioned on the Dual Strand Continuous Caster table under P005-6. Since the mold flux baghouse exhausts to the spray chamber in the caster. This exhaust gas cannot be viewed while the caster is operating. Furthermore, condition V.F.3.c states that visible notation shall be performed “in accordance with Method 22” on the caster baghouse stack. Method 22 is specific to fugitive emissions from sources and cannot be applied to a baghouse stack per EPA method instructions. In addition, no such requirement is established in any existing installation permit, operating permit, or consent decree. The condition cannot be performed, is unwarranted, and restrictive. *Eliminate condition V.F.3.c* (1 Commenter)

RESPONSE: The permit has been revised.

Vacuum Degasser

65. **COMMENT:** Condition V.G.4.a.2, Page 94. The draft Title V Permit contains an unnecessary requirement to maintain records of the amount and type of fuel used at the Vacuum Degasser. There are no applicable requirements restricting the use of fuel at the Vacuum Degasser. It is not necessary to keep records of such fuel use in order to demonstrate compliance with any applicable requirements. Additionally, it is not consistent with the reporting section. Delete Condition V.G.4.a.2. (1 Commenter)

RESPONSE: The Department believes that recording the amount and type of fuel used at the vacuum degasser is part of U.S. Steel operation and keeping the records should not be an issue, and the facility should provide the records to Department personnel upon request. Therefore, the condition remains unchanged

Riley Boiler Nos. 1, 2 & 3

66. **COMMENT:** Condition V.H.1.h, Table V-H-1, Note 2, Page 97. Note (2) to Table V-H-1 states that the 800 TPY NO_x limit is based on a 30 day average NO_x limit of 0.55 lb/MMBTU. Condition 1.5 of U. S. Steel – Edgar Thomson Plants Plan Approval Order and Agreement 235 (RACT) establishes the averaging period for the 0.55 lb/MMBTU as a thirty-day rolling average. (1 Commenter)

Proposed Resolution: Revise Note (2) as follows: *“Based on a 30-day rolling average limit of 0.55 lb/MMBTU limit”*.

RESPONSE: The permit has been revised.

67. **COMMENT:** Condition V.H.2.a, Page 97. Article XXI §2108.2.b requires existing sources with a PM allowable emission rate of 100 tons or more to conduct emissions tests every two years to demonstrate compliance with the applicable emission limitation(s) of Article XXI. The permitted allowable rate for filterable particulate matter and filterable PM₁₀ is 114.98 tons per year for each pollutant. Section V.H.2 of the Title V permit does not currently require particulate matter testing. (1 Commenter)

Proposed Language:

Condition V.H.2.a. should be revised as follows: *“The permittee shall perform particulate matter and sulfur oxides emissions testing on Riley Boilers Nos. 1, 2 and 3 once every two years from the date of the prior valid test in order to demonstrate compliance with the emission limitations of this permit. Such testing shall be conducted under maximum normal (i.e., mixed fuel) operating conditions in accordance with applicable U. S. EPA approved test methods, Article XXI §2108.02, and as approved by the Department.”*

RESPONSE: The permit will be revised by incorporating PM testing.

68. **COMMENT:** Condition V.H.2.a & b, Page 97. The draft Title V permit requires nitrogen oxide testing every two years for Riley Boilers Nos. 1, 2 and 3. These boilers are equipped with NO_x CEMS and require RATA testing in accordance with federal regulation. Nitrogen oxides testing should be deleted from condition V.H.2.a., since the Riley Boilers are equipped with certified CEMS and RATA testing is conducted in accordance with federal regulation. Article XXI §2108.02.b requires emissions testing every two years for particulate matter, sulfur oxides, or volatile organic compounds, if the allowable rate exceeds 100 tons per year. Additional nitrogen oxides emission testing is costly, redundant and overly burdensome. Nitrogen oxides testing should be deleted from condition V.H.2.a. (1 Commenter)

Proposed Language:

Condition V.H.2.a. should be revised as follows: *“The permittee shall perform particulate matter and sulfur oxides emissions testing on Riley Boilers Nos. 1, 2 and 3 once every two years from the date of the prior valid test in order to demonstrate compliance with the emission limitations of this permit. Such testing shall be conducted under maximum normal (i.e., mixed fuel) operating conditions in accordance with applicable U. S. EPA approved test methods, Article XXI §2108.02, and as approved by the Department.”*

Condition V.H.2.b. should be revised as follows: *“Compliance with the emission limitations of Conditions V.H.1.d and V.H.1.h for NO_x shall be determined by the CEMs required in Condition V.H.3.a below.*

RESPONSE: Condition V.H.2.b has given the facility the option to either use stack testing or NO_x CEM in lieu of a stack test to determine compliance with the NO_x emissions limitation. Therefore, the condition remains unchanged.

Blast Furnace Slag Pits

69. **COMMENT:** Condition V.I.4.b, Page 102. Permit No. 7035003-002-31400, issued June 30, 1995 is not an appropriate citation for the requirement. Both Permit No. 7035003-002-31400 and 31401 were issued to acknowledge that the slag pits were constructed and the cooling pits were removed from operation on June 1, 1995. This permit citation has no bearing on the record keeping requirements of the slag pits and should be removed. (1 Commenter)

Proposed Language:

The permittee shall keep and maintain the following data for the slag pit operations (§2101.05.a.1, §2103.12.a.2.B):

RESPONSE: The permit has been revised.

Plant Roads

70. **COMMENT:** Pages 103 & 104. Source letter “J” has been removed from the permit and the requirements of Plant Roads are listed as a continuation of V.I - Blast Furnace Slag Pits. (1 Commenter)

Proposed Language:

J. Plant Roads

1. Restrictions
2. Testing Requirements
3. Monitoring Requirements
4. Record Keeping Requirements
5. Reporting Requirements
6. Work Practice Standards

Update source letter associated with each remaining emission unit accordingly.

RESPONSE: The permit has been revised.

71. **COMMENT:** Conditions V.I.10.a & V.I.11.a, Page 103. The record keeping requirement for application of chemical dust suppressant does not correspond with the associated reporting requirement. The reporting requirement for chemical dust suppressant requires the dates of application, location and dilution ratio(s) of the application. However, the record keeping requirement for chemical dust suppressant requires the permittee to record the date, time, amount of undiluted chemical dust suppressant and the dilution ratio of each application. These requirements don't correspond to each other and following the record keeping requirement as written doesn't ensure that the reporting requirement will be met. The language of requirements should be clarified to ensure that the record keeping requirements correspond with the reporting requirements. (1 Commenter)

RESPONSE: The Department believes that the both the recordkeeping and reporting requirements are clear enough and does not see any issue with it. The recordkeeping requirements requires the facility to keep the record of undiluted chemical, date applied and chemical dilution ratio, while the reporting requirement requires the facility to report the chemical dilution ratio, applied location and date applied. Therefore, the condition remains unchanged.

72. **COMMENT:** Condition V.I.11.c, Page 104. Due to formatting issue referenced in comment one above, the citation referenced in the Reporting Requirements section is incorrect. (1 Commenter)

Proposed Language:

Reporting instances of non-compliance in accordance with condition V.J.5.b above does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above, if appropriate.

RESPONSE: The permit has been revised.

BOP Slag Handling

73. **COMMENT:** Condition V.K.1 through 6, Page 108. The permit improperly requires the permittee to certify compliance for the contractor's BOP slag handling operations. Though condition V.K.1.a suggests that the subpart K is applicable as an alternative operating scenario, it is not in the Alternative Operating Scenario subpart. Therefore, it is ambiguous as to when Part K would apply to the permittee. In any case, as described in the facility description, the BOP slag handling system is being operated by Tube City, IMS, LLC while the Waste Product Recycling and Briquetting is operated by Braddock Recover Inc., a division of HARSCO/MultiServ Corp. Both contractors are individually responsible for ensuring compliance with Article XXI and with current and future permits. U. S. Steel cannot certify compliance with the contractors' permits or Article XXI requirements that may apply to such operations. Only at such time when U. S. Steel assumes operations of those permitted activities can U. S. Steel certify compliance to those requirements.

In the event that U. S. Steel assumes the operations of either contractor, U. S. Steel would operate those facilities in accordance with the permits associated with the existing equipment or obtain installation permits as necessary for new/different equipment. (1 Commenter)

Proposed Resolution:

Delete subpart K BOP Slag Handling. Insert the following conditions in Section VI. Alternate Operating Scenarios.

A. BOP Slag Handling

The Edgar Thomson Plant presently uses an on-site contractor for the BOP Slag Processing activities. This alternative operating scenario is to allow the plant to conduct BOP Slag Processing activities in the event that the use of the on-site contractor is discontinued.

1. Restrictions.

- a. In the event that the use of the on-site contractor is discontinued and the permittee conducts BOP Slag Processing activities using the existing processing equipment, the permittee shall operate such equipment in accordance with the permits.*
- b. In the event that the use of the on-site contractor is discontinued and the permittee conducts BOP Slag Processing activities using processing equipment other than the existing equipment, the permittee shall submit an application as necessary for the installation of such equipment in accordance with Article XXI.*
- c. Upon request, the permittee shall provide the Department with a list of equipment (make, model, capacity etc.)*

B. Waste Product Recycling and Briquetting Process

The Edgar Thomson Plant currently uses an on-site contractor for the Briquetting of various plant sludges (furnace dust, slag and sludge, mill scale, and lime and coke fines) for recycling purposes as furnace charge. This alternative operating scenario is to allow the plant to conduct Briquetting activities in the event that the uses of the on-site contractor is discontinued.

1. Restrictions

- a. In the event that the use of the on-site contractor is discontinued and the permittee conducts Waste Product Recycling and Briquetting Process activities using the existing processing equipment, the permittee shall operate such equipment in accordance with the permits.*
- b. In the event that the use of the on-site contractor is discontinued and the permittee conducts Waste Product Recycling and Briquetting Process activities using processing equipment other than the existing equipment, the permittee shall submit an application as necessary for the installation of such equipment in accordance with Article XXI.*
- c. Upon request, the permittee shall provide the Department with a list of equipment (make, model, capacity etc.)*

PERMIT SHIELD IN EFFECT

RESPONSE: The permit has been revised.

Emissions Limitation Summary

74. **COMMENT:** Table VII-1, Page 112. While the table entitled “Emission Limitations Summary” is for informational purposes only, it should be deleted, as it does not provide accurate information. The draft permit indicates that Table VII-1 is provided for informational purposes only and is not intended to be an applicable requirement. The information contained in the table is not accurate. Many of the emission units at ET do not have emission limits for the various pollutants listed. Therefore, the totals included in the table are incorrect and the table should be deleted. (1 Commenter)

Proposed Resolution: Delete Table VII-1.

RESPONSE: The Department will make the necessary adjustments by revising the table as appropriate.

Miscellaneous

75. **COMMENT:** Insignificant and Trivial Activities Description, Page 113, Miscellaneous. The table seems to mirror the trivial activities list published in the Pennsylvania Department of Environment's (PADEP) July 2003 document titled "Air Quality Permit Exemptions", though, not in its entirety. The Department's justification for omitting certain activities is unclear. It is U. S. Steel's understanding that all trivial activities identified by the PADEP are exempt from permitting pursuant to Article XXI section §2102.04.a.5.l. Therefore the entire trivial activities list as set forth in the PADEP's document should be written into the table or incorporated by reference in addition to exemptions provided by Article XXI and those specific to Edgar Thomson Works included in the Title V Permit Application Revision submitted in March 2001. (1 Commenter)

Proposed Resolution: Modify table description as follows:

The following summarizes processes and/or activities that are exempt from permitting as insignificant and/or trivial activities per §2102.04.a.5.

Additionally:

Modify table to list all trivial activities as set forth in the PA DEP's July 2003 document as well as the exemptions provided by Article XXI and those specific to Edgar Thomson Works included in the Title V Permit Application Revision submitted in March 2001.

Or

Modify table to incorporate PA DEP's July 2003 document by reference and include the exemptions provided by Article XXI and those specific to Edgar Thomson Works included in the Title V Permit Application Revision submitted in March 2001.

RESPONSE: The permit has been revised.

Technical Support Document

76. **COMMENT:** Technical Support Document, Permit No. 0051 Technical Support Document, dated September 19, 2013. The Technical Support Document contains several errors which are substantive, grammatical, and/or typographical in nature. U.S. Steel incorporates by reference all comments provided above as they also apply to the Technical Support Document. U. S. Steel notes that the Technical Support Document contains numerous errors, some of which are significant and others which are grammatical or typographical in nature. The Technical Support Document should be revised for accuracy. (1 Commenter)

RESPONSE: The alleged errors in the Technical Support Document were not identified in the comment. However, the Department will make the necessary revisions if appropriate.

EPA Comments on US Steel Edgar Thompson Title V Permit

77. **COMMENT:** **PM Emission Limits May Not Be Protective.** The draft title V permit includes separate PM, PM-10 and PM 2.5 emissions limits. In each instance in the permit the specified PM, PM-10, and PM 2.5 limits are assumed to have the same value. This occurs in the following locations in the permit including but not limited to:

TABLE V-A-1 Blast Furnace No. 1 Emission Limitations; TABLE V-A-2 Blast Furnace No. 3 Emission Limitations; TABLE V-B-1 Emission Limitations for the No. 1 or No. 3 Blast Furnace Stoves; TABLE V-D-2: BOP Shop Emission Limitations: F & R Vessel BOP Secondary Emission Control System; Table V-E-1 - LMF Baghouse Emission Limitations ;Table V-F-1: Caster Tundish Preheaters Emission Limitations; TABLE V-H-1 Riley Boilers Emission Limitations; TABLE VII-1 Emission Limitations Summary; TABLE V-D-1 BOP Shop Emission Limitations; TABLE V-D-2: BOP Shop Emission Limitations: F & R Vessel BOP Secondary Emission Control System.

The particle size distribution of PM emissions from Iron and steelmaking processes varies significantly depending on the process step being considered. For instance, during the charging step of the steelmaking (basic oxygen process), PM-2.5 makes up about 20% of the PM emitted versus about 40% of the PM-10 emitted (see AP-42,Chapter 12.5, figure 12.5.3). The ACHD must establish realistic separate PM, PM-10 PM-2.5 permit limits using appropriate technical guidance. (1 Commenter)

RESPONSE: The referenced PM limits are *existing* limits from *existing* permits and calculated from Article XXI standards. Therefore, the PM limits are existing applicable requirements and are appropriately incorporated into the Title V permit. Furthermore, Tables V-D-2 and V-E-1 are in existing installation permits and cannot be changed via the Title V process. There is insufficient data to develop appropriate site-specific PM10 or PM2.5 limits, and while AP-42 emission factors may be appropriate to estimate emissions from sources, AP-42 emission factors cannot be used to establish limits from a specific source, as stated in the introduction page of AP-42. The Introduction to AP-42 page, says “An emission factor is a *representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant*”.

78. **COMMENT:** Coke Oven Gas H₂S limit needs to be justified. The permit includes a limit on concentrations of H₂S in coke oven gas delivered by Clairton and used by the facility of 35 grains per hundred dry standard cubic feet of coke oven gas and cites §2105.21.h.4 which allows no greater than 40 grains per hundred dry standard cubic feet of coke oven gas produced at the Clairton Works facility, when all sulfur emissions from its Claus Sulfur Recovery Plant and the tail gas cleaning equipment thereon, expressed as equivalent H₂S, are added to the measured H₂S. The ACHD must provide a discussion of how this limit was calculated include this and the appropriate assumptions and equations in the review memo. (1 Commenter)

RESPONSE: See response to condition 6 above.

79. **COMMENT:** Condition V.A.2.n, Page 41. Any Changes to Permit Limits must also go through the appropriate permitting processes. The Title V permit includes a provision (V.A.2.n) that allows the facility to change the operating limits for an emissions capture system if certain other requirements in the permit are met. This ability to change the operating limits is called out in the federal requirements

at §63.7824(c)], however, the facility should be aware that this ability to change requirements is also tied in with using their approved permitting procedures for changing any existing permitting requirements in the Title V permit. In future permitting actions, the agency should use its construction permit modification procedures to delete or change short these capture system operation limits in the underlying permit if this is where the limits originated before, or at the same time as, it changes any of these limits from the operating permit for the facility. Language to this effect is suggested to be included in the permit. (1 Commenter)

RESPONSE: The Department's normal practice is that any facility's requested changes or modification to any installation or construction permit generated conditions must go through a modification to that installation permit before reflecting in the operating permit. However, any requested modification or changes to a MACT or NSPS requirements, must go through the proper steps itemized by the MACT or NSPS as specified in condition V.A.2.n.2 (§63.7824(2)(2)) before the changes can be approved. Therefore, the Department concurred with the suggestion.

80. **COMMENT:** Condition V.A.3.e, Page 42. The Site specific Monitoring Plan Must Be Up To Date. The most recent site specific monitoring plan required by V.A.3.e was established in June 30, 2009. The facility must demonstrate that this plan reflects the facility's present monitoring procedures. (1 Commenter)

RESPONSE: The permit will make the necessary changes by incorporating the most recently established monitoring plans in the final permit.

81. **COMMENT:** Section II, Paragraph 5, Page 4, Facility Description. The fact sheet should contain an analysis showing that BOC Gasses is not a support facility. i.e , BOC can survive without US Steel's business. (1 Commenter)

RESPONSE: The Department will make the necessary revisions.

82. **COMMENT:** Condition V.A.2, Page 4. Need to provide a date for the initial testing this applies for all testing requirements in the permit. (1 Commenter)

RESPONSE: The facility has been performing source testing on most of it's sources for the last couple of years, and one of the most recent stack test was in June 2014. It is difficult to include an exact date of testing in the permit due to the logistics involved in the testing. However, the Department has already included a statement in all the source testing conditions that says "testing shall be perform once every two years from the date of the most recent valid test".

83. **COMMENT:** Condition V.B.1.a, Page 54. List good engineering practices from blast furnaces or refer to them in an applicable manual or diocument. (1 Commenter)

RESPONSE: The Department will make the necessary revisions.

LIST OF COMMENTERS

Name	Affiliation
Mark Jeffrey	United States Steel Corporation
Paul Wentworth	EPA Region 3