



Group Against Smog and Pollution Inc.
1133 South Braddock Avenue, Suite 1A, Pittsburgh, PA 15218
(Tel) 412-924-0604 www.gasp-pgh.org

Allegheny County Health Department
Building 7 of the Clack Health Center
301 39th Street
Pittsburgh, PA 15201-1811

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Via email:
aqpermits@alleghenycounty.us

Please accept the following comments from Group Against Smog and Pollution concerning the Merged Draft U.S. Steel Clairton Installation Permit to Meet The 2010 1-Hour Sulfur Dioxide National Ambient Air Quality Standards (NAAQS), ACHD Permit #: 0052-I017

I. Inspection and Maintenance

The Installation Permit (IP) notes at Section III. 5 “All air pollution control equipment required by this permit or Article XXI and all equivalent compliances techniques that have been approved by the Department, shall be properly installed, maintained, and operated with good air pollution control practices.”¹ The installation permit should include an explanation or reference to explain the necessary activities and schedule that is required of “good air pollution control practices” for the recycling project at the SCOT Plant and the upgraded Vacuum Carbonate Units. As these practices are required, they should be a part of record keeping and agency inspections.

The Clairton Coke facility’s ability to consistently control a reduced level of hydrogen sulfide (H₂S) in coke oven gas (COG) is at the heart of lower sulfur dioxide (SO₂) emission limits required in this IP. Recently U.S. Steel Clairton had a breakdown of several pieces of equipment necessary for control of SO₂. This breakdown caused a violation of the H₂S sulfur grain limit² at Clairton Coke and likely contributed to several days of exceedance of the daily 1-hour SO₂ standard occurring in the same timeframe at the downwind Liberty monitor. This breakdown emphasizes the need for careful attention to “good air pollution practices”— installation, maintenance, and operation to accompany the critical pollution control equipment (the upgrade of the vacuum carbonate units and the tail gas recycling project from the SCOT Plant identified in the SO₂ SIP).³

Additionally, equipment that may not be considered part of the pollution control projects’ upgrade but upon which these projects depend (for example, cooling equipment) should have requirements detailing maintenance, replacement schedules, and operation.

II. Vacuum Carbonate Unit

There is no mention of the upgraded 100 and 600 Vacuum Carbonate Units in the IP. As these units are being modified and reconstructed, specific requirements surrounding these projects should be in the IP⁴. At a minimum, the projects' combined upgrade completion date, which would allow for switching from one VCU to the other and having comparable pollution control, should be in the IP. Information concerning requirements for the *good air pollution control practices* including installation, maintenance, and control for these important upgraded pollution control units should outline maintenance and operation requirements that may need to be improved from requirements now in Title V.

III. Complete The Pollution Control Construction And Make The Emission Reduction Requirements Effective Sooner Than The Last Minute Of The October 4, 2018 Attainment Date

Statements such as the following are found in the SO₂ SIP with notice of the words **on or before**.

- * “a tail gas recycling project is also planned for completion **on or before October 4, 2018.**” (section 3.2 A, page 8)
- * “Maximum modeled rates and new short-term limits as listed in Table 3-3 will be adopted **on or before October 4, 2018.**” The Table 3-3 in the SIP includes many of the same sources in Table II-1 in the IP. (section 3.2 D, page 11)

The IP does not contain such language but drops the “before” with language that says, for example,

- * Part IV. 26. a “The restrictions and requirements in Sections V.A and V.B will become effective October 4, 2018.” (Part IV. 26. a)

As can be seen by the recent breakdown at U.S. Clairton, the construction of the new and updated pollution control equipment should proceed with all speed as the SO₂ SIP suggests with “**before**” the attainment date. The SO₂ exceedances at the Liberty monitor are demonstrating emission levels very likely associated with real health issues in the community and indicate the need to require the IP SO₂ pollution control components and sources with limits be in place rapidly, not all at the very last minute on the possible attainment date on October 4 of 2018.

IV. IP.III General Conditions 15.d.3 has an error

The dates that semiannual reports are due on seem to be incorrect.

1. Allegheny County Health Department (ACHD), Article XXI, §2105.03
2. Email from ACHD staff in response to query
3. ACHD, Proposed *Revision to the Allegheny County Portion of the Pennsylvania State Implementation Plan Attainment Demonstration for the Allegheny, PA SO₂ Nonattainment Area 2010 Standards*
4. ACHD, Article XXI, §2102.04.a.1.A
It shall be a violation of this Article giving rise to the remedies set forth in Part I of this Article for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment to

which this Part applies unless: A. The Department has first issued an Installation Permit for such source or equipment; or...

Thank you for the opportunity to submit these comments.

Suzanne Seppi, GASP Project Manager