



GROUP AGAINST SMOG & POLLUTION

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Via email

Allegheny County Health Department
Air Quality Program
301 39th St., Building 7
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aqpermits@achd.net

March 2, 2015

**Re: Comments of Group Against Smog and Pollution Regarding Draft Title V
Operating Permit Renewal #0050 - United States Steel Corporation, Mon Valley
Works, Irvin Plant**

Dear Sir or Madam:

Please accept these comments regarding draft Title V Operating Permit renewal #0050 for United States Steel Corporation, Mon Valley Works, Irvin Plant, Camp Hollow Road, West Mifflin, PA 15122 on behalf of the Group Against Smog and Pollution (GASP). Thank you for providing this opportunity to comment.

Sincerely,



Joe Osborne

GASP COMMENTS REGARDING DRAFT TITLE V OPERATING PERMIT RENEWAL #0050 - UNITED STATES STEEL CORPORATION, MON VALLEY WORKS, IRVIN PLANT

1. ACHD’s CAM applicability analysis is inconsistent with the CAM applicability requirements of 40 CFR Part 64. ACHD must reevaluate CAM applicability prior to issuing a final permit.

The draft permit for the Irvin Plant contains no compliance assurance monitoring (CAM) requirements for the facility. However, the Allegheny County Health Department Air Program (ACHD) appears to have misconstrued the CAM applicability requirements in making this determination. The ACHD review memo for the Irvin Plant permit renewal states,

“The Compliance Assurance Monitoring (CAM) rule found in 40 CFR 64 is not applicable to the facility pursuant to §64.2(a)(2), which states ‘the CAM requirements apply to unit that uses control device to achieve compliance with any such emission limitation or standard.’ Therefore, since the sources in the facility that have the potential to emit 100 tons or more per year of criteria pollutants do not have any control device, it is exempt from the CAM requirement.”¹

ACHD’s interpretation of CAM applicability requirements is far too narrow. CAM requirements generally² apply to any emission unit that,

“(1) . . . is subject to a [Clean Air Act] emission limitation or standard for [a] regulated air pollutant . . . ; (2) . . . uses a control device to achieve compliance with any such emission limitation or standard; and (3) has potential *pre-control device* emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. *For purposes of this paragraph, ‘potential pre-control device emissions’ shall have the same meaning as ‘potential to emit,’ as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.*”³

Based on the CAM applicability discussion in the ACHD review memo, it appears that the Department has failed to conduct a complete CAM applicability analysis. First, it is unclear whether ACHD properly accounted for regulated air pollutants with major source thresholds <100 TPY (e.g, HAPs, VOCs); the ACHD review memo mentions only emission units “that have the potential to emit 100 tons or more per year of criteria pollutants”⁴

Second, it appears that ACHD has failed to evaluate those control-device-equipped emission units with potential controlled emissions below an applicable major source threshold

1 ACHD, Review Memo for Renewal Title V Operating Permit - U.S. Steel Irvin Plant (Dec. 8, 2014) at 6.

2 Certain CAM applicability exemptions not relevant to the Irvin permit are listed in 40 C.F.R. 64.2(b).

3 40 C.F.R. § 64.2(a) (emphasis added).

4 ACHD, Review Memo at 6.

and potential uncontrolled emissions above the threshold. The Irvin Plant operating permit renewal application materials provided to GASP did not include uncontrolled emission calculations or control device efficiencies for many of the emission units at the Irvin facility; however GASP has identified at least one emission unit that may fall into this category: Potential controlled emissions from the cold reduction mill are 31.25 TPY of PM₁₀ and 31.25 TPY of VOC.⁵ PM and VOC emissions from the cold reduction mill are controlled via a cyclonic mist eliminator.⁶ Depending on the cyclone control efficiency, uncontrolled emissions from the cold reduction mill unit could easily exceed the applicable major source thresholds for VOCs or PM₁₀. “The control efficiency range for conventional single cyclones is estimated to be . . . 30 to 90 percent for PM₁₀.”⁷

Prior to issuing a final operating permit renewal for the Irvin Plant, ACHD must perform a new CAM applicability analysis that is consistent with the CAM applicability criteria described in 40 C.F.R. § 64.2 for the emission units located at the facility.

2. ACHD must incorporate CAM requirements for coke oven gas flares 1-3 and peachtree flares A and B into the final permit.

As discussed in the previous section, CAM requirements generally apply to control-device-equipped emission units with potential uncontrolled emissions in excess of an applicable major source threshold.⁸ Potential uncontrolled VOC and CO emissions from coke oven gas flares 1-3 and peachtree flares A and B, taken individually, exceed the respective 50 and 100 TPY major source thresholds for each pollutant.⁹ Flares are control devices as defined in 40 C.F.R. § 64.1.

Thus ACHD must incorporate terms and conditions sufficient to satisfy CAM requirements for coke oven gas flares 1-3 and peachtree flares A and B prior to issuing a final permit. According to EPA, “[r]ules that require flares to meet 40 CFR 60.18 (general control device requirements) have been determined to be presumptively acceptable for CAM.”¹⁰

3. The draft permit process numbers associated with the 64" continuous coil HCl pickle line are inconsistent.

The draft permit lists multiple, inconsistent process numbers for the 64" continuous coil HCl pickle line. The draft permit alternately assigns process numbers P002¹¹ and P021¹² to this equipment.

5 ACHD, Draft Title V Operating Permit Renewal - US Steel Irvin Plant (Dec. 8, 2014) at 58.

6 *Id.* at 56, *see also* US Steel, Title V Operating Permit Renewal Application - US Steel Irvin Plant (Jul 31, 2009) at 85).

7 USEPA, Air Pollution Control Technology Fact Sheet - Cyclones at 1, available at <http://www.epa.gov/ttnchie1/mkb/documents/fcyclone.pdf>.

8 40 C.F.R. § 64.2(a); *see also*, text accompanying footnote 3, *supra*.

9 *See* ACHD, Review Memo for Renewal Title V Operating Permit - U.S. Steel Irvin Plant (Dec. 8, 2014) Table V-K-1 at 4 and USEPA, Emission Factor Documentation for AP-42 Section 12.2 - Coke Production (May 2008) Table 4-13 at 4-152, *available at* http://www.epa.gov/ttnchie1/ap42/ch12/bgdocs/b12s02_may08.pdf.

10 USEPA, Technical Guidance Document: Compliance Assurance Monitoring (Aug. 1998) at 3-10, *available at* <http://www.epa.gov/ttn/emc/cam/toc-ch3.pdf>.

11 *See e.g.* ACHD, Draft Title V Operating Permit Renewal - US Steel Irvin Plant (Dec. 8, 2014) at 2 & 43.

12 *See e.g. Id.* at 4.