

Criteria Pollutant/Air Monitoring Subcommittee

SO₂ SIP – Comments, Changes



April 19, 2017



Public Comment Period/Hearing

- Comment Period: Mar. 7th – Apr. 11th
 - Public Hearing: Apr. 6th
 - 3 Speakers
- Written comments received
 - Over 1500 pages of comments
 - Many were the identical comment (submitted by multiple commenters)
 - ACHD identified 71 specific comments
- Changes to SIP are substantial enough to provide additional comment period
 - Revised SIP underway (finalized next week)



Control Strategy

- Comments: Control Strategy is incomplete for several items
 - Enforceable limits for each process
 - Averaging periods for specific sources, if assigned longer-term
 - Method/dates for federally enforceable permits/orders
 - Source monitoring for compliance
 - Alternative control strategy should not be allowed
 - Enforceability of permanent shutdowns
 - Confusing as to which processes are being controlled
- Revised SIP
 - Will include limits for each process
 - Including averaging periods
 - Will include date for enforceable measures (permits or other enforceable action, as needed)



Control Strategy (cont.)

- Revised SIP (cont.)
 - Will indicate method of compliance
 - Continuous monitoring for sources with longer-term averaging
 - Option for alternative controls will be removed
 - Would constitute a new SIP revision
 - Will be restructured for better description of controls and affected processes
 - New Appendix J added
 - Further description of USS controls, including new Edgar Thomson stack
 - Documentation concerning shutdown for Guardian Industries
 - Also for Elrama and Mitchell, which are not part of control strategy since outside of the NAA, but excluded from control case model run



Longer-Term Averaging

- Comments
 - Some in favor of, others against
 - If longer-term averaging used
 - Analysis needs to be included
 - Method(s) for compliance should be included

- Revised SIP
 - Will include longer-term averaging for specific sources
 - Based on variability of sulfur content in coke oven gas (COG)
 - Clairton boilers and underfiring; all Irvin process except galvanizing
 - Compliance will be determined by H₂S monitoring (and flow meters) in process streams
 - Limits will be for SO₂
 - Analysis for longer-term averaging (and periods) ongoing
 - Analysis will be included in new section in Appendix D (Emissions and Modeling Inventories) or a new Appendix K



Insufficient Sections

- Comments: SIP is missing key elements
 - Contingency Measures
 - Reasonably Available Control Measures/Technology (RACM/RACT)
 - Reasonable Further Progress (RFP)
 - New Source Review (NSR)
 - Transportation Conformity

- Revised SIP
 - Sections will be expanded or added to SIP
 - Contingency Measures (Section 7) and RACM/RACT (Section 6) expanded
 - RFP and NSR will be new subsections under Section 7 (Contingency Measures)
 - Transportation Conformity will be a new Section 8



Modeling Configuration

- Comments
 - Meteorological and modeling simulations are case-specific to this SIP
 - MMIF configuration
 - Use of multiple meteorological sets, combined via post-processing
 - BLP-based method for buoyant fugitives
 - SIP should reference previous Model Clearinghouse memorandums concerning this method
 - Modeling Guideline (40 CFR Part 51 Appendix W) is not yet effective
 - ADJ_U* is appropriate, other options such as LOWWIND3 should be considered

- Revised SIP
 - Appendix A (Protocol) will be revised to include Clearinghouse memos
 - ACHD anticipates that Modeling Guideline will become final on May 22
 - Current configuration is best possible regulatory approach



Revised Control Case Modeling

- Comments
 - U. S. Steel requests revised control case rates for some sources
 - Also, revised stacks for Clairton PEC Baghouses
 - Each individual stack, not aggregated stacks like used by ACHD
- Revised SIP
 - Small changes to control case rates (both increasing and decreasing)
 - ACHD has verified that new rates show future case attainment
 - Design Value of 196.29 $\mu\text{g}/\text{m}^3$
 - Revised PEC Baghouse stacks are better characterization
 - Revised SIP will include the requested rates and stacks
 - Changes to tables/values in SIP and Appendices



Other Comments

- SIP in General
 - In support of SIP (or SIP needs more)
 - Additional comment period needed
 - Controls are not timely enough
 - More controls can be implemented
 - Typographical errors

- Monitoring
 - Additional monitors should be deployed
 - Current monitors show attainment or 1-year of data below NAAQS
 - 2016 monitored data is not yet official/certified



Other Comments (cont.)

- Weight of Evidence
 - More should be added
 - Additional reductions not quantified
 - Control case scenario is theoretical worst-case that cannot be achieved in real-life

- Modeling/Meteorology
 - AERMOD can lead to overestimation
 - The model performance evaluations are too subjective
 - Also forgives time and space
 - The screening and meteorological analyses are too subjective

- Revised SIP
 - Typos will be corrected, some clarifications will be made



New Schedule for 2017

- 2nd Public Comment Period: May/June
- Subcommittee: June
- Advisory Committee: June
- Board of Health: July 12th
- Final SIP to PA DEP: July
- Forward to EPA Region 3: by Aug. 17th